

# Gates County Inter-Regional Transportation System (GITS)



Date Adopted  
February/6/2017

## Title VI Program Plan



**PLAN REVIEW AND APPROVAL**

On behalf of the Gates County Board of Commissioners for the Gates County Inter-Regional Transportation System (GITS), I hereby acknowledge receipt of the Title VI Nondiscrimination Plan. We, the board, have **reviewed and hereby approve** this Plan. We are committed to ensuring that all decisions are made in accordance with the nondiscrimination guidelines of this Plan, to the end the no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any GITS transportation services and activities on the basis of race, color, national origin, sex, age, religion, or disability, as protected by Title VI of the Civil Rights Act of 1964 and the nondiscrimination provisions of the Federal Transit Administration.

Natalie Marie Rountree  
Signature of Authorizing Official

2/6/17  
DATE

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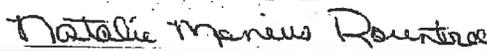
**TITLE VI NONDISCRIMINATION AGREEMENT  
BETWEEN  
THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION  
AND  
GATES COUNTY INTER-REGIONAL TRANSPORTATION SYSTEM, GITS**

In accordance with DOT Order 1050.2A, the Gates County Inter-Regional Transportation System (GITS) assures the North Carolina Department of Transportation (NCDOT) that no person shall, on the ground of **race, color, national origin, sex, religion, age, or disability**, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and related nondiscrimination authorities, 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 GITS .

Further, GITS hereby agrees to:

1. Designate a Title VI Coordinator that has a responsible position within the organization and easy access to the Gates County Manager of the organization.
2. Issue a policy statement, signed by the Gates County Manager of the organization, which expresses a commitment to the nondiscrimination provisions of Title VI and related applicable statutes. The signed policy statement shall be posted and circulated throughout the organization and to the general public, and published where appropriate in languages other than English. The policy statement will be re-signed when there is a change of Gates County Manager.
3. Insert the clauses of the contract language from Section 6.1 in every contract awarded by the organization. Ensure that every contract awarded by the organization's contractors or consultants also includes the contract language.
4. Process all and, when required, investigate complaints of discrimination consistent with the procedures contained within this Plan. Log all complaints for the administrative record.
5. Collect statistical data (race, color, national origin, sex, age, disability) on participants in, and beneficiaries of, programs and activities carried out by the organization.
6. Participate in training offered on Title VI and other nondiscrimination requirements. Conduct or request training for employees or the organization's sub recipients.
7. Take affirmative action, if reviewed or investigated by NCDOT, to correct any deficiencies found within a reasonable time period, not to exceed 90 calendar days, unless reasonable provisions are granted by NCDOT.
8. Document all Title VI nondiscrimination-related activities as evidence of compliance. Submit information and reports to NCDOT on a schedule outlined by NCDOT.

**THIS AGREEMENT** 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.

  
\_\_\_\_\_  
Authorized Signature  
  
\_\_\_\_\_  
Date

Natalie Rountree  
Gates County Manager

## 1.0 INTRODUCTION

Title VI of the 1964 Civil Rights Act, 42 U.S.C. 2000d provides that: "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." The broader application of nondiscrimination law is found in other statutes, executive orders, and regulations, which provide additional protections based on age, sex, religion, and disability, including the 1987 Civil Rights Restoration Act, which extended nondiscrimination coverage to all programs and activities of federal-aid recipients, sub recipients, and contractors, including those that are not federally-funded (see Appendix A – Applicable Nondiscrimination Authorities).

The Gates County Inter-Regional Transportation System (GITS) is a recipient of Federal financial assistance from the North Carolina Department of Transportation (NCDOT) and the United States Department of Transportation (USDOT), receiving Federal Transit Administration (FTA) funds through the NCDOT. As the primary recipient of USDOT funds in North Carolina, the NCDOT's comprehensive Title VI Nondiscrimination Program includes compliance oversight and technical assistance responsibilities towards its sub recipients and those sub recipients must use federal and state funds in a nondiscriminatory manner.

The Gates County Inter-Regional Transportation System (GITS) establishes this Title VI Nondiscrimination Plan for the purpose of complying with Title VI of the Civil Rights Act of 1964, as required by FTA Circular 4702.1B, and related requirements outlined under Group 01.D, "Nondiscrimination Assurance," of the FTA Certifications and Assurances. This document details the nondiscrimination program, policies, and practices administered by this organization, and will be updated periodically to incorporate changes and additional responsibilities as they are made.

## 2.0 DESCRIPTION OF PROGRAMS AND SERVICES

**Gates County Inter-Regional Transportation System, GITS**, is the coordinated public transportation program for the County of Gates. GITS will provide transportation for any county residents to various appointments. GITS will utilize subscription and demand response trips to service clients. **The primary areas** requested are Ahoskie (Hertford County), Elizabeth City (Pasquotank County), Edenton (Chowan County), and Suffolk, Smithfield, Norfolk, Virginia.

The hours of operations are 5:00 a.m. to 7:00 p.m. on Monday thru Friday and some Saturdays available by requests.

GITS receives FTA federal and state funds for capital, administration, and occasional operation grant fund.

### 2.1 PROGRAM(S) AND SERVICES ADMINISTERED

The Gates County Inter-Regional Transportation System (GITS) provides public transportation options to its customers within Gates County, North Carolina. Three trips to Ahoskie are conducted daily: at 8:00 a.m., 10:00 a.m. (departure 12 noon), 2:00 p.m., and 3:45 is our final pick-up. Three trips to Elizabeth City; at 8:00 a.m., 10:00 a.m. (departure 12 noon), 2:00 p.m., and 4:00 is our final pick-up. Trips to Edenton will be provided Monday, and Wednesday mornings from 10:00 a.m. to 12:00 noon to various medical centers. A trip to Tyner Community Care Clinic will be provided on Thursday mornings 9:00-12:00 noon. Three trips to Suffolk, Va. are conducted daily: at 6:00 a.m., 10:00 a.m. (departure 12 noon), 2:00 p.m., and 5:00 is our final pick-up. Trips are made daily to Smithfield Virginia at 6:55 a.m. and 4:00 p.m. In addition, trips for Greenville, NC are made on Tuesday and Thursday mornings 9:00 a.m. to 1:00 p.m. Trips to Norfolk, Virginia are made Monday, Tuesdays & 2<sup>nd</sup> and 4<sup>th</sup> Thursdays from 10:00 a.m. to 1:00 p.m.; trips to Virginia Beach 1st Thursdays from 10:00 a.m. to 1:00 p.m.; trips to Hampton VA are made on

3<sup>rd</sup> Wednesdays from 10:00 a.m. to 1:00 p.m. We, also make trips to Duke University Hospital on occasion as needed.

The hours of operations are 5:00 a.m. to 7:00 p.m. on Monday thru Friday and some Saturdays available by requests.

**Fare Structure**

<b>Destination</b>	<b>FAC</b>	<b>One-way Fare</b>	<b>Trip Fare</b>
In County trips	\$28.75	\$2.00	\$ 4.00
Ahoskie	\$45.00	\$4.00	\$ 8.00
Greenville	\$75.00	****	\$16.00
Pasquotank/Edenton	\$47.50	\$4.00	\$ 8.00
Suffolk	\$47.50	\$4.00	\$ 8.00
Smithfield	\$63.75	\$5.00	\$10.00
Norfolk/Va. Beach	\$63.75	****	\$15.00
Hampton VA Hospital	\$80.00	****	\$18.00

**FAC is the fully allocated cost for service.**

We have assigned vehicles depending on the service areas. In the event that persons with disabilities are on the schedule, we will change the service vehicle to accommodate for wheelchairs. If you would like to schedule a ride or to contact us, please call (252)357-4487(GITS), (for hearing impaired call 1 (800)735-2962 TDD/TTY), by fax (252) 357-4489, or at 714 Main Street, Gatesville, NC 27938 from 8:30 a.m. to 12:15 p.m. and 1:15 p.m. to 5:00 p.m. In addition, our e-mail address is [plassiter@gatescountync.gov](mailto:plassiter@gatescountync.gov), and website address is [gatescounty.govoffice2.com](http://gatescounty.govoffice2.com). We look forward to serving you. GITS operates with nine vehicles. Two minivans, two conversion vehicles, three LTV's, and two conversion vans with lifts. We have one director, one administrative assistant, one dispatcher/operator, one full-time driver, one part-time operator aide, and eleven part-time operators.

**2.1 FUNDING SOURCES / TABLES**

For the purpose of federally-assisted programs, "federal assistance" shall include:

1. grants and loans of Federal funds;
2. the grant or donation of Federal property and interest in property;
3. the detail of Federal personnel;
4. the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and
5. any Federal agreement, arrangement, or other contract which has, as one of its purposes, the provision of assistance.

Each FTA Formula Grant received by our system during the past year, and whether the funds were received through NCDOT or directly from FTA, is checked below. Additional details are provided on how often each of the grants is received (*annually, first time, etc.*) and the amount. [To check a box, double click on the check box. In the pop up select "Checked."]

<b>Grant Title</b>	<b>NCDOT</b>	<b>FTA</b>	<b>Details (i.e., purpose, frequency, and duration of receipt)</b>
<b>5307</b> (Urbanized Area Formula)	<input type="checkbox"/>	<input type="checkbox"/>	
<b>5309 (b)(2)</b> (Fixed Guideway Modernization)	<input type="checkbox"/>	<input type="checkbox"/>	

5310 (Transportation for Elderly Persons and Persons with Disabilities)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Enhanced Elderly Transportation \$66,000
5311 (Formula Grants for Other than Urbanized Areas)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Community Transportation Program \$115,600
5311 (b)(3) (Rural Transit Assistance)	<input type="checkbox"/>	<input type="checkbox"/>	
5316 (Job Access and Reverse Commute)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Employment and Employment related services \$40,000
5317 (New Freedom)	<input type="checkbox"/>	<input type="checkbox"/>	
5303, 5304 and/or 5305 (Metropolitan & Statewide Planning)	<input type="checkbox"/>	<input type="checkbox"/>	
5339 (Bus and Bus Facilities Formula)	<input type="checkbox"/>	<input type="checkbox"/>	
Other:	<input type="checkbox"/>	<input type="checkbox"/>	

## 2.2 DECISION-MAKING PROCESS

Gates County Inter-Regional Transportation System Advisory Board advises the Gates County Board of Commissioners (Governing board) on programmatic issues and policies for the GITS program. After which the suggested policies or programmatic issues with we taken to the Gates County Board of Commissioners. Upon hearing the advisory boards suggestions, the Gates County Board of Commissioners motion and vote on whether to past the suggested policies, and/or procedures. After policies are passed by the Gates County Board of Commissioners they are forwarded to NCDOT PTD for approval.

Board or Committee Name	Appointed	Elected	# of Members
Transit Advisory Board	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	

## 2.3 TITLE VI COORDINATOR

The individual below has been designated as the Title VI Coordinator for the Gates County Inter-Regional Transportation System (GITS), and is empowered with sufficient authority and responsibility to implement the Title VI Nondiscrimination Program:

Patrice Taylor-Lassiter  
 Transportation Director  
 714 Main Street, Gatesville, NC 27938  
 252-358-1443  
[plassiter@gatescountync.gov](mailto:plassiter@gatescountync.gov)

Key responsibilities of the Coordinator include:

- Maintaining knowledge of Title VI and related requirements.
- Attending civil rights training when offered by NCDOT or any other regulatory agency.
- Administering the Title VI Nondiscrimination Program and coordinating implementation of this Plan.
- Making sure internal staff and officials are familiarized and complying with their Title VI nondiscrimination obligations.
- Disseminating Title VI information internally and to the general public, including in languages other than English.
- Presenting Title VI-related information to decision-making bodies for input and approval.
- Ensuring Title VI-related posters are prominently and publicly displayed.
- Developing a process to collect data related to race, national origin, sex, age, and disability to ensure minority, low-income, and other underserved groups are included and not discriminated against.
- Ensuring that non-elected boards and committees reflect the service area and minorities are represented.
- Implementing procedures for prompt processing (receiving, logging, investigating and/or forwarding) of discrimination complaints.
- Coordinating with, and providing information to, NCDOT and other regulatory agencies during compliance reviews or complaint investigations.
- Promptly resolving areas of deficiency to ensure compliance with Title VI nondiscrimination requirements.

#### 2.4 CHANGE OF TITLE VI COORDINATOR AND/OR GATES COUNTY MANAGER

If Title VI Coordinator or Gates County Manager changes, this document and all other documents that name the Coordinator, will immediately be updated, and an updated policy statement and assurance will be signed by the new Gates County Manager.

#### 2.5 ORGANIZATIONAL CHART

An organizational chart showing the Title VI Coordinator's place within the organization is located in **Appendix B**.

#### 2.6 SUBRECIPIENTS

GITS does not have pass through funds to any other organizations and, therefore, does not have any sub recipients.

### 3.0 TITLE VI NONDISCRIMINATION POLICY STATEMENT

It is the policy of the Gates County Inter-Regional Transportation System (GITS), as a federal-aid recipient, to ensure that no person shall, on the ground of **race, color, national origin, sex, religion, age or disability**, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of our programs and activities, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all other related nondiscrimination laws and requirements.

Signature Patrice Taylor Lassiter

Patrice Taylor-Lassiter, Transportation Director

2/6/10  
Date

#### **Title VI and Related Authorities**

Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d) provides that, “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.” The 1987 Civil Rights Restoration Act (P.L. 100-259) clarified and restored the original intent of Title VI by expanding the definition of “programs and activities” to include all programs and activities of federal-aid recipients (such as, GITS), sub recipients, and contractors, whether such programs and activities are federally-assisted or not.

Related nondiscrimination authorities include, but are not limited to: U.S. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act”; 49 U.S.C. 5332, “Nondiscrimination (Public Transportation)”; FTA Circular 4702.1B - Title VI Requirements and Guidelines for Federal Transit Administration Recipients; DOT Order 5610.2a, “Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”; FTA C 4703.1 - Environmental Justice Policy Guidance For Federal Transit Administration Recipients; Policy Guidance Concerning (DOT) Recipient's Responsibilities to Limited English Proficient (LEP) Persons, 74 FR 74087; The Americans with Disabilities Act of 1990, as amended, P.L. 101-336; Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 790; Age Discrimination Act of 1975, as amended 42 U.S.C. 6101; Title IX of the Education Amendments of 1972, 20 U.S.C. 1681; Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 U.S.C. 4601; Section 508 of the Rehabilitation Act of 1973, 29 U.S.C. 794d; [Any others PTD wishes to add, such as Section 13 of Master Agreement or 01.D of Certs/Assurances...]

#### **Implementation**

- This statement will be signed by the Director of the Gates County Inter-Regional Transportation System, and re-signed whenever a new person assumes that position.
- The signed statement will be posted on office bulletin boards, near the receptionist's desk, in meeting rooms, inside vehicles, and disseminated within brochures and other written materials.
- The *core* of the statement (signature excluded) will circulate *internally* within annual acknowledgement forms.
- The statement will be posted or provided in languages other than English, when appropriate.

#### 4.0 NOTICE OF NONDISCRIMINATION

- GITS operates its programs and services without regard to **race, color, national origin, sex, religion, age, and disability** in accordance with Title VI of the Civil Rights Act and related statutes. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice may file a complaint with GITS.
- For more information on the **GITS'** civil rights program, and the procedures to file a complaint, contact 252-357-4487, (TTY 800-735-2962); email [title.vi.complaint@gatescountync.gov](mailto:title.vi.complaint@gatescountync.gov); or visit our administrative office at 714 Main Street, Gatesville, NC 27938. For more information, visit [www.gatescountyoffice2.gov](http://www.gatescountyoffice2.gov).
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington, DC, 20590.
- If information is needed in another language, contact 252-357-4487. *Si se necesita informacion en otro idioma de contacto, 252-357-4487.*

##### **Implementation**

- The notice will be posted in its entirety on our website and in any documents and reports we distribute.
- Ads in newspapers and other publications shall include the first three (3) bullets.
- The statement will be posted or provided in languages other than English, when appropriate.

## 5.0 PROCEDURES TO ENSURE NONDISCRIMINATORY ADMINISTRATION OF PROGRAMS AND SERVICES

We are committed to the nondiscriminatory administration of our programs and services. As with the implementation of our programs in general, organization-wide compliance is required. Thus, employees and staff will periodically be reminded of our Title VI nondiscrimination obligations through staff training and use of the **Annual Education and Acknowledgment Form** below. The Title VI Coordinator will periodically assess program operations to ensure that this policy is being followed. A single copy of the form is located in Appendix D.

### **Annual Education and Acknowledgement Form**

#### **Title VI Nondiscrimination Policy**

*(Title VI and related nondiscrimination authorities)*

No person shall, on the grounds of race, color, national origin, sex, age, or disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity of a Federal-aid recipient.

All employees and representatives of GITS are expected to consider, respect, and observe this policy in their daily work and duties. If any person approaches you with a civil rights-related question or complaint, please direct him or her to Patrice Taylor-Lassiter, Title VI Coordinator at 252-357-4487.

In all dealings with the public, use courtesy titles (e.g., Mr., Mrs., Miss, Dr.) to address or refer to them without regard to their race, color, national origin, sex, age or disability.

#### ***Acknowledgement of Receipt of Title VI Program***

I hereby acknowledge receipt of GITS' Title VI Program and other nondiscrimination guidelines. I have read the Title VI Program and I am committed to ensuring that no person is excluded from participation in or denied the benefits of GITS' programs, policies, services and activities on the basis of race, color, national origin, sex, age, or disability, as provided by Title VI of the Civil Rights Act of 1964 and related nondiscrimination statutes.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

#### **Implementation**

- Periodically, but not more than once a year, employees and representatives will receive, review and certify commitment to the Title VI Program.
- New employees shall be informed of Title VI provisions and expectations to perform their duties accordingly, asked to review the Title VI Program, and required to sign the acknowledgement form.
- Periodic review of operational practices and guidelines by the Title VI Coordinator to verify compliance with the Title VI Program.
- Signed acknowledgement forms and records of internal assessments will remain on file for at least three years.

## 6.0 CONTRACT ADMINISTRATION

Gates County Inter-Regional Transportation System, GITS, ensures all contractors will fulfill their contracts in a nondiscriminatory manner. While contractors are not required to prepare a Title VI Program, they must comply with the nondiscrimination requirements of the organization to which they are contracted. Gates County Inter-Regional Transportation System, GITS, and its contractors will not discriminate in the selection and retention of contractors (at any level) or discriminate in employment practices in connection with any of our projects.

### 6.1 CONTRACT LANGUAGE

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

(1) **Compliance with Regulations:** The contractor shall comply with the Regulation relative to nondiscrimination in Federally-assisted programs of the Department of Transportation (hereinafter, "DOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

(2) **Nondiscrimination:** The contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, national origin, sex, religion, age, or disability in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

(3) **Solicitations for Subcontractors, Including Procurements of Materials and Equipment:** In all solicitations either by competitive bidding or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.

(4) **Information and Reports:** The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Gates County Inter-Regional Transportation System or the North Carolina Department of Transportation (NCDOT), the Federal Highway Administration (FHWA) and/or Federal Transit Administration (FTA) to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information

required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall so certify to the GITS, or the NCDOT, FHWA and/or FTA as appropriate, and shall set forth what efforts it has made to obtain the information.

(5) **Sanctions for Noncompliance:** In the event of the contractor's noncompliance with the nondiscrimination provisions of this contract, the GITS shall impose such contract sanctions as it or the NCDOT, FHWA and/or FTA may determine to be appropriate, including, but not limited to:

- (a) withholding of payments to the contractor under the contract until the contractor complies, and/or
- (b) cancellation, termination or suspension of the contract, in whole or in part.

(6) **Incorporation of Provisions:** The contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The contractor shall take such action with respect to any subcontract or procurement as the GITS or the NCDOT, FHWA and/or FTA may direct as a means of enforcing such provisions including sanctions for noncompliance: Provided, however, that, in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request the GITS to enter into such litigation to protect the interests of the GITS, and, in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

\*The Contractor has read and is familiar with the terms above:

\_\_\_\_\_  
Contractor's Initials

\_\_\_\_\_  
Date

#### Implementation

- The nondiscrimination language above (**with** initials line) will be appended to any *existing* contracts, purchase orders, and agreements that do not include it, and initialed by the responsible official of the other organization.
- The nondiscrimination language above (**without** initials line) will be incorporated as standard language before the signature page of our standard contracts, purchase orders, and agreements.

- The Title VI Coordinator will review *existing* contracts to ensure the language has been added.

## 6.2 NONDISCRIMINATION NOTICE TO PROSPECTIVE BIDDERS

The Gates County Inter-Regional Transportation System, in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities, and Title 49 Code of Federal Regulations, Parts 21 and 26, hereby notifies all bidders that it will affirmatively insure that in any contact entered into pursuant to this advertisement, minority and women business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, or sex in consideration for an award.

### Implementation

- The nondiscrimination language above will be included in all solicitations for bids for work or material and proposals for negotiated agreements to assure interested firms that we provide equal opportunity and do not discriminate.
- Outreach efforts will be made to minority and women-owned firms that work in requested fields, and documented.
- Unless specifically required under Disadvantaged Business Enterprise (DBE) or Affirmative Action programs, all contractors will be selected without regard to their race, color, national origin, or sex.

## 7.0 EXTERNAL DISCRIMINATION COMPLAINT PROCEDURES

These discrimination complaint procedures describe the process used by Gates county Inter-Regional Transportation System (GITS) to process and investigate complaints of alleged discrimination filed under Title VI of the Civil Rights Act of 1964 and related nondiscrimination laws that are applicable to programs, services, and activities carried out by Gates County Inter-Regional Transportation System.

Complaints will be investigated by the appropriate authority. Upon completion of every investigation, Gates County Inter-Regional Transportation System will inform the complainant of all avenues of appeal. Gates County Inter-Regional Transportation System will make every effort to obtain early resolution of complaints at the lowest level possible. The option of informal mediation between the affected parties and Gates County Inter-Regional Transportation System staff may be utilized for resolution.

### FILING OF COMPLAINTS

1. **Applicability** – The complaint procedures apply to the beneficiaries of Gates County Inter-Regional Transportation System programs, activities, and services, such as the members of the public and any consultants/contractors hired by Gates County Inter-Regional Transportation System.
2. **Eligibility** – Any person or class of persons who believes that he/she has been subjected to discrimination or retaliation prohibited by any of the Civil Rights authorities based upon race, color, sex, age, national origin, or disability, may file a written complaint with Gates County Inter-Regional Transportation System. The law prohibits intimidation or retaliation of any sort. The complaint may be filed by the affected individual or a representative, and must be in writing.
3. **Time Limits and Filing Options** – A complaint must be filed no later than 180 calendar days after the following:
  - The date of the alleged act of discrimination; or
  - The date when the person(s) became aware of the alleged discrimination; or
  - Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

Complaints may be submitted to the following entities:

- Gates County Inter-Regional Transportation System at [title.vi.complaint@gatescountync.gov](mailto:title.vi.complaint@gatescountync.gov)
  - **North Carolina Department of Transportation**, Office of Equal Opportunity and Workforce Services, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or toll free 800-522-0453
  - **US Department of Transportation**, Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202-366-4070
  - **Federal Transit Administration**, Office of Civil Rights, ATTN: Title VI Program Coordinator, East Bldg. 5<sup>th</sup> Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590
  - **Federal Highway Administration**, Office of Civil Rights, 1200 New Jersey Avenue, SE, 8<sup>th</sup> Floor, E81-314, Washington, DC 20590, 202-366-0693 / 366-0752
  - **Federal Highway Administration**, North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010
  - **Federal Aviation Administration**, Office of Civil Rights, 800 Independence Avenue, SW, Washington, DC 20591, 202-267-3258
  - **US Department of Justice**, Special Litigation Section, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, DC 20530, 202-514-6255 or toll free 877-218-5228
4. **Format for Complaints** – Complaints shall be in **writing and signed** by the complainant(s) or a representative and include the complainant's name, address, and telephone number. Complaints received by fax or e-mail will be acknowledged and processed. Allegations received by telephone or in person will be reduced to writing, may be recorded and will be provided to the complainant for confirmation or revision before processing. Complaints will be accepted in other languages, including Braille.

5. **Discrimination Complaint Form** – The Discrimination Complaint Form is consistent with the Nondiscrimination Assurance in Group 01.D of the FTA Certifications & Assurances.
6. **Complaint Basis** – Allegations must be based on issues involving race, color, national origin, sex, age, or disability. The term “basis” refers to the complainant’s membership in a protected group category.

Protected Categories	Definition	Examples	Applicable Statutes and Regulations	
			FHWA	FTA
Race	An individual belonging to one of the accepted racial groups; or the perception, based usually on physical characteristics that a person is a member of a racial group	Black/African American, Hispanic/Latino, Asian, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, White	Title VI of the Civil Rights Act of 1964; 49 CFR Part 21; 23 CFR 200	Title VI of the Civil Rights Act of 1964; 49 CFR Part 21; Circular 4702.1B
Color	Color of skin, including shade of skin within a racial group	Black, White, brown, yellow, etc.		
National Origin	Place of birth. Citizenship is not a factor. Discrimination based on language or a person’s accent is also covered.	Mexican, Cuban, Japanese, Vietnamese, Chinese		
Sex	Gender	Women and Men	1973 Federal-Aid Highway Act	Title IX of the Education Amendments of 1972
Age	Persons of any age	21 year old person	Age Discrimination Act of 1975	
Disability	Physical or mental impairment, permanent or temporary, or perceived.	Blind, alcoholic, paraplegic, epileptic, diabetic, arthritic	Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990	

### Complaint Processing

1. When a complaint is received by Gates County Inter-Regional Transportation System, a written acknowledgment and a Consent Release form will be mailed to the complainant within ten (10) business days by registered mail.
2. Gates County Inter-Regional Transportation System **cannot investigate Title VI complaints filed against itself**, but can investigate ADA complaints against itself. Gates County Inter-Regional Transportation System will consult with the NCDOT External Civil Rights Section to determine the acceptability and jurisdiction of all complaints received. (Note: If NCDOT has jurisdiction, the External Civil Rights Section will be responsible for the remainder of this process. Gates County Inter-Regional Transportation System will record the transfer of responsibility in its complaints log).
3. Additional information will be requested if the complaint is incomplete. The complainant will be provided 15 business days to submit any requested information and the signed Consent Release form. Failure to do so may be considered good cause for a determination of no investigative merit.
4. Upon receipt of the requested information and determination of jurisdiction, Gates County Inter-Regional Transportation System will notify the complainant and respondent of whether the complaint has sufficient merit to warrant investigation.
5. If the complaint is investigated, the notification shall state the grounds of the Gates County Inter-Regional Transportation System’s jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
6. If the complaint does not warrant investigation, the notification to the complainant shall specifically state the reason for the decision.

### Complaint Log

1. When a complaint is received by Gates County Inter-Regional Transportation System, the complaint will be entered into the Discrimination Complaints Log with other pertinent information, and assigned a **Case Number**. (Note: All complaints must be logged).
2. The complaints log will be submitted to the NCDOT’s Civil Rights office during Title VI compliance reviews. (Note: NCDOT may also be request the complaints log during pre-grant approval processes).

3. The **Log Year(s)** since the last submittal will be entered (e.g., 2012-2015, 2014-2015, FFY 2015, or 2015) and the complaints log will be signed before submitting the log to NCDOT.
4. When reporting **no complaints**, check the **No Complaints or Lawsuits** box and sign the log.

Gates County Inter-Regional Transportation System  
**DISCRIMINATION COMPLAINT FORM**

**Any person who believes that he/she has been subjected to discrimination based upon race, color, religion, sex, age, national origin, or disability may file a written complaint with Gates County Inter-Regional Transportation System, within 180 days after the discrimination occurred.**

Last Name:		First Name:		<input type="checkbox"/> Male
				<input type="checkbox"/> Female
Mailing Address:		City	State	Zip
Home Telephone:	Work Telephone:	E-mail Address		

Identify the Category of Discrimination:

RACE                       COLOR                       NATIONAL ORIGIN                       AGE  
 RELIGION                       DISABILITY                       SEX

*\*NOTE: Title VI bases are race, color, national origin. All other bases are found in the "Nondiscrimination Assurance" of the FTA Certifications & Assurances.*

Identify the Race of the Complainant

Black                       White                       Hispanic                       Asian American  
 American Indian                       Alaskan Native                       Pacific Islander                       Other \_\_\_\_\_

Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.

Names of individuals responsible for the discriminatory action(s):

How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. **(Attach additional page(s), if necessary).**

The law prohibits intimidation or **retaliation** against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.

Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: (Attached additional page(s), if necessary).

<u>Name</u>	<u>Address</u>	<u>Telephone</u>
1. _____	_____	_____
2. _____	_____	_____
3. _____	_____	_____
4. _____	_____	_____

**DISCRIMINATION COMPLAINT FORM**

Have you filed, or intend to file, a complaint regarding the matter raised with any of the following? If yes, please provide the filing dates. Check all that apply.

- NC Department of Transportation \_\_\_\_\_
- Federal Transit Administration \_\_\_\_\_
- Federal Highway Administration \_\_\_\_\_
- US Department of Transportation \_\_\_\_\_
- Federal or State Court \_\_\_\_\_
- Other \_\_\_\_\_

Have you discussed the complaint with any Gates County Inter-Regional Transportation System, GITS, representative? If yes, provide the name, position, and date of discussion.

Please provide any additional information that you believe would assist with an investigation.

Briefly explain what remedy, or action, are you seeking for the alleged discrimination.

**\*\*WE CANNOT ACCEPT AN UNSIGNED COMPLAINT. PLEASE SIGN AND DATE THE COMPLAINT FORM BELOW.**

\_\_\_\_\_  
**COMPLAINANT'S SIGNATURE**

\_\_\_\_\_  
**DATE**

**MAIL COMPLAINT FORM TO:**  
 NORTH CAROLINA DEPARTMENT OF TRANSPORTATION  
 OFFICE OF EQUAL OPPORTUNITY & WORKFORCE SERVICES  
 EXTERNAL SERVICES SECTION  
 1511 MAIL SERVICE CENTER  
 RALEIGH, NC 27699-1511  
 919-508-1808 or 800-522-0453

**FOR OFFICE USE ONLY**

Date Complaint Received: \_\_\_\_\_

Processed by: \_\_\_\_\_

Case #: \_\_\_\_\_

Referred to:  NCDOT  FTA Date Referred: \_\_\_\_\_



## INVESTIGATIVE GUIDANCE

- A. Scope of Investigation** – An investigation should be confined to the issues and facts relevant to the allegations in the complaint, unless evidence shows the need to extend the issues.
- B. Developing an Investigative Plan** – It is recommended that the investigator prepares an Investigative Plan (IP) to define the issues and lay out the blueprint to complete the investigation. The IP should follow the outline below:
1. Complainant(s) Name and Address (Attorney name and address if applicable)
  2. Respondent(s) Name and Address (Attorney for the Respondent(s) name and address)
  3. Applicable Law(s)
  4. Basis/(es)
  5. Allegation(s)/Issue(s)
  6. Background
  7. Name of Persons to be interviewed
    - a. Questions for the complainant(s)
    - b. Questions for the respondent(s)
    - c. Questions for witness(es)
  8. Evidence to be obtained during the investigation
    - a. Issue – Complainant allege that there are only six African American contractors participating in the highway construction industry in the State and their contract awards are very small.
      - i. Documents needed: documents which show all DBE firms which currently have contracts and must include the following 1) name and race of DBE firm; 2) Date of initial certification into the DBE program; 3) type of business; 4) contracts awarded anytime during the period to the present; 5) dollar value of contract.
- C. Request for Information** – The investigator should gather data and information pertinent to the issues raised in the complaint.
- D. Interviews** – Interviews should be conducted with the complainant, respondent, and appropriate witnesses during the investigative process. Interviews are conducted to gain a better understanding of the situation outlined in the complaint of discrimination. The main objective during the interview is to obtain information that will either support or refute the allegations.
- E. Developing an Investigative Report** – The investigator should prepare an investigative report setting forth all relevant facts obtained during the investigation. The report should include a finding for each issue. A sample investigative report is provided below.

## TEMPLATE/SAMPLE Investigative Report

- I. COMPLAINANT(S) NAME** (or attorney for the complainant(s) – name and address if applicable  
Name, Address, Phone: 999-999-9999)
- II. RESPONDENT(S)** (or attorney for the respondent(s) – name and address if applicable)  
Name, Address, Phone: 999-999-9999
- III. APPLICABLE LAW/REGULATION**  
[For example, Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d); 49 CFR §21.11; 49 CFR §26.53)]
- IV. COMPLAINT BASIS/(ES)**  
[For example, Race, Color, National Origin, Religion, Sex, Age, Disability)]
- V. ISSUES/ALLEGATIONS**  
[Describe in logical sequence, each allegation including the prohibited basis for the alleged discriminatory conduct, (e.g., race, color, religion, sex, national origin, age, or disability) and the specific statutory or regulatory provision the allegation would violate, if proven to be true.]  
  
Issue #1 – Complainant alleges that transit system failed to inform minority communities of rate increases.  
Issue #2 – Complainant alleges that transit system has not sufficiently publicized or held public meetings to share information regarding fare increases and route changes that impacts low-income and minority citizens.
- VI. BACKGROUND**  
[Provide detailed information regarding the complaint, including a historical overview of the case, including any activities or actions taken prior to accepting the complaint for investigation.]
- VII. INVESTIGATIVE PROCEDURE**  
[Describe in detail, methods used to conduct the investigation, such as document requests, interviews and site visits. Include witnesses' names and addresses, documents received and/or reviewed, emails sent and received.]
- VIII. ISSUES / FINDINGS OF FACT**  
[Provide a detailed description of the investigator's analysis of each allegation, based on clear and factual findings. Include specific evidence used to support your findings.]
- IX. CONCLUSION**  
[State whether discrimination did or did not occur. Conclusions must be evidence-based and defensible. Test conclusions by considering all possible rebuttal arguments from the respondent and complainant. Both respondent and the complainant should be given an opportunity to confirm or rebut the assertions of the other party and your findings, but all the evidence you've presented should speak for itself.]
- X. RECOMMENDED ACTIONS**  
[Outline what should be done to remedy the findings or, if necessary, provide justice for the complainant.]

### APPENDIX

[Include in the Appendix any supplemental materials that support your findings and conclusion.]

## 8.0 SERVICE AREA POPULATION CHARACTERISTICS

To ensure that Title VI reporting requirements are met, Gates County Inter-Regional Transportation System will collect and maintain population data on potential and actual beneficiaries of our programs and services. This section is intended as a compilation of relevant population characteristics from our overall service area. This data will provide context to the Title VI Nondiscrimination Program and be used to ensure nondiscrimination and improve public outreach initiatives and delivery of ongoing programs.

### 8.1 RACE AND ETHNICITY

The following table was completed using data from Census Table QT-P3, Race and Hispanic or Latino Origin: 2010:

Subject	Number	Percent
<b>RACE</b>		
<input checked="" type="checkbox"/> Total population	12,197	100.0
<input checked="" type="checkbox"/> One race	11,977	98.2
White	7,768	63.7
Black or African American	4,044	33.2
<input checked="" type="checkbox"/> American Indian and Alaska Native	65	0.5
American Indian, specified [1]	35	0.3
Alaska Native, specified [1]	1	0.0
Both American Indian and Alaska Native, specified [1]	0	0.0
American Indian or Alaska Native, not specified	29	0.2
Asian	17	0.1
Native Hawaiian and Other Pacific Islander	10	0.1
Some Other Race	73	0.6
<input checked="" type="checkbox"/> Two or More Races	220	1.8
Two races with Some Other Race	16	0.1
Two races without Some Other Race	179	1.5
Three or more races with Some Other Race	1	0.0
Three or more races without Some Other Race	24	0.2
<b>HISPANIC OR LATINO</b>		
<input checked="" type="checkbox"/> Total population	12,197	100.0
<input checked="" type="checkbox"/> Hispanic or Latino (of any race)	173	1.4
Mexican	60	0.5
Puerto Rican	40	0.3

Subject	Number	Percent
<b>Cuban</b>	0	0.0
<b>Other Hispanic or Latino [2]</b>	73	0.6
<b>Not Hispanic or Latino</b>	12,024	98.6
<b>RACE AND HISPANIC OR LATINO</b>		
<b>Total population</b>	12,197	100.0
<b>One race</b>	11,977	98.2
Hispanic or Latino	152	1.2
Not Hispanic or Latino	11,825	97.0
<b>Two or More Races</b>	220	1.8
Hispanic or Latino	21	0.2
Not Hispanic or Latino	199	1.6

## 8.2 AGE & SEX

The following table was completed using data from Census Table QT-P1, Age Groups and Sex: 2010:

Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
<b>Total population</b>	12,197	5,962	6,235	100.0	100.0	100.0	95.6
<b>Under 5 years</b>	695	355	340	5.7	6.0	5.5	104.4
<b>5 to 9 years</b>	772	392	380	6.3	6.6	6.1	103.2
<b>10 to 14 years</b>	851	454	397	7.0	7.6	6.4	114.4
<b>15 to 19 years</b>	882	438	444	7.2	7.3	7.1	98.6
<b>20 to 24 years</b>	654	322	332	5.4	5.4	5.3	97.0
<b>25 to 29 years</b>	589	290	299	4.8	4.9	4.8	97.0
<b>30 to 34 years</b>	589	282	307	4.8	4.7	4.9	91.9
<b>35 to 39 years</b>	720	329	391	5.9	5.5	6.3	84.1
<b>40 to 44 years</b>	889	450	439	7.3	7.5	7.0	102.5
<b>45 to 49 years</b>	1,096	518	578	9.0	8.7	9.3	89.6
<b>50 to 54 years</b>	976	495	481	8.0	8.3	7.7	102.9
<b>55 to 59 years</b>	888	440	448	7.3	7.4	7.2	98.2
<b>60 to 64 years</b>	765	362	403	6.3	6.1	6.5	89.8
<b>65 to 69 years</b>	615	302	313	5.0	5.1	5.0	96.5
<b>70 to 74 years</b>	469	230	239	3.8	3.9	3.8	96.2
<b>75 to 79 years</b>	299	131	168	2.5	2.2	2.7	78.0
<b>80 to 84 years</b>	241	95	146	2.0	1.6	2.3	65.1
<b>85 to 89 years</b>	143	62	81	1.2	1.0	1.3	76.5
<b>90 years and over</b>	64	15	49	0.5	0.3	0.8	30.6
<b>Under 18 years</b>	2,903	1,491	1,412	23.8	25.0	22.6	105.6

Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
18 to 64 years	7,463	3,636	3,827	61.2	61.0	61.4	95.0
18 to 24 years	951	470	481	7.8	7.9	7.7	97.7
25 to 44 years	2,787	1,351	1,436	22.8	22.7	23.0	94.1
25 to 34 years	1,178	572	606	9.7	9.6	9.7	94.4
35 to 44 years	1,609	779	830	13.2	13.1	13.3	93.9
45 to 64 years	3,725	1,815	1,910	30.5	30.4	30.6	95.0
45 to 54 years	2,072	1,013	1,059	17.0	17.0	17.0	95.7
55 to 64 years	1,653	802	851	13.6	13.5	13.6	94.2
65 years and over	1,831	835	996	15.0	14.0	16.0	83.8
65 to 74 years	1,084	532	552	8.9	8.9	8.9	96.4
75 to 84 years	540	226	314	4.4	3.8	5.0	72.0
85 years and over	207	77	130	1.7	1.3	2.1	59.2
16 years and over	9,690	4,659	5,031	79.4	78.1	80.7	92.6
18 years and over	9,294	4,471	4,823	76.2	75.0	77.4	92.7
21 years and over	8,854	4,250	4,604	72.6	71.3	73.8	92.3
60 years and over	2,596	1,197	1,399	21.3	20.1	22.4	85.6
62 years and over	2,297	1,052	1,245	18.8	17.6	20.0	84.5
67 years and over	1,555	699	856	12.7	11.7	13.7	81.7
75 years and over	747	303	444	6.1	5.1	7.1	68.2
Median age (years)	42.0	41.4	42.5	(X)	(X)	(X)	(X)

### 9.0 TITLE VI EQUITY ANALYSES (AND ENVIRONMENTAL JUSTICE ASSESSMENTS)

As required under FTA C 4702.1B and 4703.1, Title VI equity and environmental justice (EJ) analyses will be conducted whenever we plan to construct (or modify) a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., or when there will be a change in fares. These studies will be conducted to see if the change could result in either a disparate impact based on race, color or national origin (Title VI) or a disproportionately high and adverse impact to minority and/or low-income populations (EJ). Thus, they will look at various alternatives before selecting a site for the facility. Project-specific demographic data will be collected on potentially affected communities and their involvement in associated decision-making activities will be documented. Specific studies will be made available to oversight agencies during compliance reviews or to evidence our due diligence should a complaint be filed in relation to the location and effect of a proposed facility or fare increases. Project-related equity and EJ studies will remain on file indefinitely.

## 10.0 PUBLIC INVOLVEMENT

<b>Subrecipient:</b>		
Gates County		
<b>Contact Person:</b>	Natalie Rountree	<i>Natalie Marieus Rountree</i>
		<b>Date:</b> 12/12/2014

### Strategies and Desired Outcomes

To promote inclusive public participation, the **Gates County Inter-Regional Transportation System** will use its resources available to employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Expand traditional outreach methods. Think outside the box: go to hair salons, barbershops, street fairs, faith-based institutions, libraries, etc.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Provide childcare and food during meetings, if possible.
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use newspaper ads that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.

### Documented Public Outreach

The direct public outreach and involvement activities conducted by GITS are summarized in the table below. Efforts include *meetings, surveys, focus groups, etc.*

Information pertinent to each event and/or activity will be provided to NCDOT upon request. Examples include copies of: meeting announcements, agendas, posters, attendee list, etc.

Event Date	Transit System Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc.).	Notes (Meeting size and format, location, Number of Attendees, etc.)
12/11/2014	Director	LEP Program Fair	Sent letters Nov 2014 to LEP families	Meeting/School Sponsor	6

## 10.1 INTRODUCTION

Effective public involvement is a key element in addressing Title VI in decision-making. Recipients engaged in planning and other decision-making activities must have a documented public participation process that provides adequate notice of public participation activities, and early and continuous opportunities for public review and comment at key decision points.

Underlying these efforts is our commitment to determining the most effective outreach methods for a given project or population.

This **Public Participation Plan** describes how GITS will disseminate vital agency information and engage the public by seeking out and considering the needs and input of interested parties and those traditionally underserved by existing transportation systems, such as minority and limited English proficient persons, who may face challenges accessing programs and other services. General public involvement practices will include:

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
- Employing different meeting sizes and formats.
- Coordinating with community- and faith-based organizations, educational institutions, and other entities to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- 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.
- Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP persons could also include audio programming available on podcasts.

## 10.2 PUBLIC NOTIFICATION

Passengers and other interested persons will be informed of their rights under Title VI and related authorities with regard to our program. The primary means of achieving this will be posting and disseminating the policy statement and notice as stipulated in Sections 3.0 and 4.0, respectively. Additional measures may include openly stating our obligations and the public's rights at meetings, placing flyers at places frequented by targeted populations, and an equal opportunity tag-on at the end of radio announcements. The method of notification will be determined through an initial screening of the area.

## 10.3 DISSEMINATION OF INFORMATION

Information on Title VI and other programs will be crafted and disseminated to employees, contractors and subrecipients, stakeholders, and the general public. Public dissemination efforts may vary depending on factors present, but will generally include: posting public statements setting forth our nondiscrimination policy in eye-catching designs and locations; placing brochures in public places, such as government offices, transit facilities, and libraries; having nondiscrimination language within contracts; including nondiscrimination notices in meeting announcements and handouts; and displaying our Notice of Nondiscrimination at all our public meetings.

At a minimum, nondiscrimination information will be disseminated on our website and on posters in conspicuous areas at our office(s). Project-related information and our most current Title VI-related information will be maintained online.

## 10.4 MEETINGS AND OUTREACH

There is no one-size-fits-all approach to public involvement. A variety of comprehensive and targeted public participation methods will be used to facilitate meaningful public involvement. Methods for engaging stakeholders and target audiences, including traditionally underserved and excluded populations (i.e., minorities, youth, low-income, the disabled, etc.) will include the following:

### Public Relations and Outreach

Public relations and outreach (PRO) strategies aim to conduct well-planned, inclusive and meaningful public participation events that foster good relations and mutual trust through shared decision-making with the communities we serve.

- We will seek out and facilitate the involvement of those potentially affected.

- Public events will aim to be collaborative, fun, and educational for all, rather than confrontational and prescriptive.
- Media plans will typically involve multiple channels of communication like mailings, radio, TV, and newspaper ads.
- Abstract objectives will be avoided in meeting announcements. Specific “attention-grabbing” reasons to attend will be used, such as “Help us figure out how to relieve congestion on [corridor name]” or “How much should it cost to ride the bus? Let us know on [date].”
- Efforts will be made to show how the input of participants can, or did, influence final decisions.
- We will do our best to form decision-making committees that look like and relate to the populations we serve.
- We will seek out and identify community contacts and partner with local community- and faith-based organizations that can represent, and help us disseminate information to, target constituencies.
- Demographic data will be requested during public meetings, surveys, and from community contacts and committee members.

### Public Meetings

“Public meeting” refers to any meeting open to the public, such as hearings, charrettes, open house and board meetings.

- Public meetings will be conducted at times, locations, and facilities that are convenient and accessible.
- Meeting materials will be available in a variety of predetermined formats to serve diverse audiences.
- An assortment of advertising means may be employed to inform the community of public meetings.
- Assistance to persons with disabilities or limited English proficiency will be provided, as required.

### Small Group Meetings

A small group meeting is a targeted measure where a meeting is held with a specific group, usually at their request or consent. These are often closed meetings, as they will typically occur on private property at the owner’s request.

- If it is determined that a targeted group has not been afforded adequate opportunities to participate, the group will be contacted to inquire about possible participation methods, including a group meeting with them individually.
- Unless unusual circumstances or safety concerns exist, hold the meeting at a location of the target group’s choosing.
- Share facilitation duties or relinquish them to members of the target group.
- Small group discussion formats may be integrated into larger group public meetings and workshops. When this occurs, the smaller groups will be as diverse as the participants in the room.

### Community Surveying

- Opinion surveys will occasionally be used to obtain input from targeted groups or the general public on their transportation needs, the quality or costs of our services, and feedback on our public outreach efforts.
- Surveys may be conducted via telephone, door-to-door canvassing, at community fairs, by placing drop boxes in ideal locations, or with assistance from other local agencies like social services.

## 10.5 LIMITED ENGLISH PROFICIENCY

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

In an effort to comply with DOT’s LEP policy guidance and Executive Order 13166, this section of our public participation plan outlines the steps we will take to ensure meaningful access to all benefits, services, information, and other important portions of our programs and activities by individuals who are limited-English proficient. Accordingly, a four factor analysis

was conducted to determine the specific language services appropriate to provide, and to whom, to inform language assistance planning and determine if our communication with LEP persons is effective.

### Four Factor Analysis

This Four Factor Analysis is an individualized assessment that balances the following four factors:

- (1) Demography: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee;
- (2) Frequency: The frequency with which LEP individuals come in contact with the program;
- (3) Importance: The nature and importance of the program, activity, or service provided by the recipient to people's lives; and
- (4) Resources and Costs: The resources available to the recipient and costs.

**Factor #1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program, activity, or service of the recipient.**

### LEP Four Factor Analysis

- **Factor 1: Demography:** What is the number or proportion of LEP persons served and the languages spoken in the service area?

#### Overview

The first factor of the *Four Factor Analysis* is the basis of the Language Assistance Plan. It requires GITS to review its US Census data to determine if it meets the *LEP Safe Harbor Threshold*.

#### US Census and American Community Survey (ACS) Data<sup>1</sup>

GITS did the following:

1. 45% Analyzed the LEP demographic data for the **(GITS) Gates County Inter-Regional Transportation System's** program and/or service area by calculating the *Safe Harbor Threshold* for two to three of the largest language groups identified other than English.
  - a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that "Speaks English less than very well" by the total population of the county.
    - i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less) GITS must provide translation of vital documents in written format for the non-English users.
    - ii. Examples of written translation of vital documents include the Title VI policy statement and/or Notice to the Public (Appendix 2), Title VI

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<sup>1</sup> The ACS publishes data in many forms on the Census Bureau American Fact Finder website <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml>

Complaint Procedure (Appendix 3), Title VI Complaint Form (Appendix 4), and ADA paratransit eligibility forms.

2. Explained the results of the analysis of the county LEP data in the demographic section of the *Four Factor Analysis*.

- ✓ **Factor 2: Frequency:** How often does your staff (and/or contractor/lessee) come into contact with LEP persons?

Overview

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn't mean they don't speak English or are identified as LEP. The summary below discusses the frequency with which **Gates County Inter-Regional Transportation System** staff, and/or its contractor/lessee come into contact with LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons.

- Factor 3: Importance:** How does the program, service or activity affect people's lives?

Overview

The summary below discusses how GITS' program and services impact the lives of people within the community. GITS will specify the community organizations that serve LEP persons, if available.

- ✓ **Factor 4: Resources and Costs:** What funding and other resources are available for LEP outreach?

Overview

The summary below discusses the low cost methods used by GITS to provide outreach to LEP persons as well as train staff (and/or its contractor/lessee) on Title VI and LEP principles.

*Additional Required Elements*

In addition to the *Four Factor Analysis* (listed below as item #1), GITS will address the following elements:

- Item #2:* A description of how language assistance services are provided by language
- Item #3:* A description of how LEP persons are informed of the availability of language assistance service
- Item #4:* A description of how the language assistance plan is monitored and updated
- Item #5:* A description of how employees are trained to provide language assistance to LEP persons

*And, any additional information deemed necessary.*

## **GITS – Summary of the Language Assistance Plan Components**

### **Item #1 – Results of the Four Factor Analysis (including a description of the LEP population(s) served)**

#### **Example**

##### **Factor 1 – Demography**

*GITS does not contract with a transit provider to provide transportation service for the **Gates County Inter-Regional Transportation System** and in Gates County.*

*The US Census Bureau – American Fact Finder (2008-2012) reports there are numerous languages spoken in USA County. Some of these languages include Spanish, German, Russian, Japanese, Hmong, and Vietnamese. After English, the second largest language group is Spanish.*

*The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), GITS must provide translation of vital documents in written format for non-English speaking persons.*

*In Gates County, with a population estimate of 11,500, persons have identified themselves as Spanish speaking and “speaks English less than well”. This language group is less than 1% and below the 5% or 1,000-person threshold. This means GITS is not required to provide written translation of vital documents. All of the other language groups listed above are also below the safe harbor threshold. This means, at this time, GITS is also not required to provide written translation of vital documents in these languages.*

*Because GITS is below the safe harbor threshold and is not required to provide written translation of vital documents, they are not currently provided.*

*In the future, if GITS meets the Safe Harbor Threshold for any language group, it will provide written translation of vital documents in such languages and also consider measures needed for oral interpretation.*

##### **Factor 2 – Frequency**

*GITS (and its contractor/lessee, if relevant) will be trained on what to do when they encounter a person that speaks English less than well. GITS and/or its contractor/lessee will track the number of encounters and consider making adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the **Gates County Inter-Regional Transportation System's** programs and services.*

*The **Gates County Inter-Regional Transportation System** provides rides to many persons each year. While formal data has not been collected, the system has indicated it has encountered (0) zero LEP persons using the service within the last six months.*

*The Gates County Inter-Transportation System has an open door policy and will provide rides to any person who requests a ride. If an individual has speech limitations, the dispatcher or driver will work with the Transit Director and the **Gates County Inter-Regional Transportation System**, if needed to ensure the individual receives access to the transportation service.*

##### **Factor 3 – Importance**

*The **Gates County Inter-Regional Transportation System** and our contractor/transit provider understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education or access to employment. A transportation system is a key link to connecting LEP persons to these essential services.*

*The **Gates County Inter-Regional Transportation System's** assessment of what programs, activities and services that are most critical included contact with community organization(s) that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to the LEP populations.*

**Factor 4 – Resources and Costs**

*Even though the **Gates County Inter-Regional Transportation System** does not have a separate budget for LEP outreach, it will work with our contractor/transit provider to implement low cost methods of reaching LEP populations meeting the Safe Harbor threshold. For example, the **Transportation System** will contract a LEP speaking person as needed to translate information to LEP persons meeting the Safe Harbor threshold. In addition, the **Transit System** and our contractor/transit provider work with local advocacy groups to reach LEP populations.*

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

**Example**

*The **Gates County Inter-Regional Transportation System** will utilize translation websites and/or contractors as needed to reach populations that meet the Safe Harbor threshold. In addition, we work with our contractor/transit provider to ensure mechanisms are in place to reach LEP persons in the service area. For example, we will provide a special brochure to assist LEP populations in understanding the transportation service for populations that meet the Safe Harbor threshold.*

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

**Example**

*The **Gates County Inter-Regional Transportation System** and its contractor/transit provider does the following to inform LEP persons of the availability of language assistance services: publishing timetables and route maps in languages other than English, provide pictograms and other symbols in relevant published materials, striving to employ multilingual staff, and creating and posting multi-language announcements, posters and other information for any LEP populations that meet the Safe Harbor threshold .*

*The **Gates County Inter-Regional Transportation System** and our contractor also attend any Latino festivals and functions in the area for the LEP population. The **Gates County Inter-Regional Transportation System** will continue to reach out to LEP populations by visiting local elder housing sites with concentrations of Latinos as well as visiting any local non-English speaking churches and/or events.*

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

**Example**

The **Gates County Inter-Regional Transportation System** reviews its plan on an annual basis or more frequently as needed. In particular, the **Gates County Inter-Regional Transportation System** will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.

In addition, if relevant, the **Gates County Inter-Regional Transportation System** will meet with its contractor/transit provider on an annual basis to ensure the Title VI requirements are met.

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

**Example**

**Gates County Inter-Regional Transportation System** employees are oriented on the principles of Title VI and the **Gates County Inter-Regional Transportation System's** Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs. The **Gates County Inter-Regional Transportation System** will ensure that any contractor/transit provider also educates its staff on Title VI requirements, and specifically LEP provisions.

An important discussion point is that of language assistance. If a driver, dispatcher or employee needs further assistance related to LEP program participants, her/she will work with the **Gates County Inter-Regional Transportation System's** Title VI Coordinator and/or its contractor/transit provider to identify strategies to meet the language needs of the participants of the program or service.

10.6 DEMOGRAPHIC REQUEST

The following form was used to collect required data on Key Community Contacts and nonelected committee members. A single copy of the "Demographic Request" form is located in Appendix D:

Gates County Inter-Regional Transportation System is required by Title VI of the Civil Rights Act of 1964 and related authorities to record demographic information on members of its boards and committees. Please provide the following information:

<p><b>Race/Ethnicity:</b></p> <p><input type="checkbox"/> White</p> <p><input type="checkbox"/> Black/African American</p> <p><input type="checkbox"/> Asian</p> <p><input type="checkbox"/> American Indian/Alaskan Native</p> <p><input type="checkbox"/> Native Hawaiian/Pacific Islander</p> <p><input type="checkbox"/> Hispanic/Latino</p> <p><input type="checkbox"/> Other (please specify): _____</p>	<p><b>National Origin:</b> (if born outside the U.S.)</p> <p><input type="checkbox"/> Mexican</p> <p><input type="checkbox"/> Central American: _____</p> <p><input type="checkbox"/> South American: _____</p> <p><input type="checkbox"/> Puerto Rican</p> <p><input type="checkbox"/> Chinese</p> <p><input type="checkbox"/> Vietnamese</p> <p><input type="checkbox"/> Korean</p> <p><input type="checkbox"/> Other (please specify): _____</p>
<p><b>Gender:</b> <input type="checkbox"/> Male    <input type="checkbox"/> Female</p>	<p><b>Age:</b></p> <p><input type="checkbox"/> Less than 18      <input type="checkbox"/> 45-64</p> <p><input type="checkbox"/> 18-29              <input type="checkbox"/> 65 and older</p> <p><input type="checkbox"/> 30-44</p>
<p><b>Disability:</b> <input type="checkbox"/> Yes    <input type="checkbox"/> No</p>	
<p><b>I choose not to provide any of the information requested above:</b> <input type="checkbox"/></p>	

Completed forms will remain on file as part of the public record. For more information regarding Title VI or this request, please contact Gates County Inter-Regional Transportation System at 252-357-4487 or by email at [title.vi.complaint@gatescountync.gov](mailto:title.vi.complaint@gatescountync.gov).

Please sign below acknowledging that you have completed this form.

Thank you for your participation!

Name (print): \_\_\_\_\_

Signature: \_\_\_\_\_

**Implementation**

- Forms will be completed prior to triennial Title VI compliance reviews and remain on file for three years.
- All new and existing members of appointed decision-making boards or committees will be **required** to complete this form for reporting purposes.
- If a member, for whatever reason, selects *"I choose not to provide any of the information requested above,"* they will have also **completed** the form.
- If a member chooses not to provide any of the information on the form, the Title VI Coordinator will be permitted to indicate that member's race and gender, based on the Coordinator's best guess.
- Data from these forms will be used to complete the Demographic Request Table in Appendix D
- Once a new member submits this form, the Demographic Request Table for the associated committee will be updated.

**10.7 KEY COMMUNITY CONTACTS**

Contact Name	Community Name	Interest or Affiliation	Also a Committee Member? (Y/N)
N/A			

Contact information for key community contacts is not public information and is maintained outside of this document. Any staff member who wishes to contact anyone listed above must request that information from the Title VI Coordinator.

**10.8 SUMMARY OF OUTREACH EFFORTS MADE SINCE THE LAST TITLE VI PROGRAM SUBMISSION**

The following format will be used to report all outreach efforts made since our last NCDOT Title VI Compliance Review. All meetings and disseminations of information shall enable collection of information for the table below:

Meeting Date	Meeting Time	Meeting Purpose	Target Audience	Information Disseminated

## 11.0 STAFF TRAINING

All employees will receive basic Title VI training at least once every three years. New hires will receive this training within 15 days of their start date. Basic training will cover all sections of this Plan and our overall Title VI obligations. Staff may receive specialized training on the application of Title VI in their specific work areas. Those who routinely encounter the public, such as office personnel, call center staff, and vehicle drivers, will receive annual refresher training. Trainings will be provided or organized by the Title VI Coordinator, and will often coincide with updates to our nondiscrimination policies and procedures. Records of staff trainings will be remaining on file for at least three years (and in personnel files), and will include agendas, sign-in sheets, copies of calendars, and any certificates issued.

## 12.0 NONELECTED BOARDS AND COMMITTEES – BY RACE AND GENDER

The table below depicts race and gender compositions for each of our nonelected (appointed) decision-making bodies. Refer to Appendix D for member names and full demographics for each committee.

Body	Male %	Female %	Caucasian %	African American %	Asian American %	Native American %	Other %	Hispanic %
Service Area Population	49%	51%	63.9%	33.1%	.2%	.5%	0%	0%
Transit Advisory Board	33%	67%	45%	55%	0%	0%	0%	0%

### Strategies for Representative Committees

We will seek minority participation and strive for committees that are representative of our constituencies by:

- Openly asking public and small group meeting participants if they would be interested in serving on a committee.
- Seeking referrals from local organizations and key community contacts that serve or represent minorities.
- Exploring different types of committees, such as ad hoc minority- or youth-only Citizen Advisory Committees.
- Outreach efforts and responses (or lack thereof from those asked to serve or refer others) will be documented.

## 13.0 RECORD-KEEPING AND REPORTS

Records will be kept to document compliance with the requirements of the Title VI Program. Unless otherwise specified, Title VI-related records shall be retained indefinitely. These records will be made available for inspection by authorized officials of the NCDOT and/or FTA. As a sub recipient of FTA funds through NCDOT, we are required to submit a Title VI Program update to NCDOT every three years, the next of which is due in **2020**. Reports on Title VI-related activities and progress to address findings identified in civil rights compliance reviews and assessments may also be submitted on an as-requested basis. It will occasionally be necessary to update this program plan and its component parts (e.g., complaints, Public Involvement, and LEP), applicable documents, and responsible officials. Updates will be submitted to NCDOT for review and approval.

**In addition to other items throughout this plan**, records and reports due at the time of compliance reviews or investigations will include:

Compliance Reviews

- Title VI Program Plan
- List of civil rights trainings provided or received
- Summaries from any *internal* reviews conducted
- Ads and notices for specific meetings
- Findings from reviews by any other *external* agencies
- Title VI equity analyses and EJ assessments
- Discrimination Complaints Log

\*PTD reporting expectations, such as related quarterly or annual reports, public outreach or actual LEP expenses, etc.

Complaint Investigations

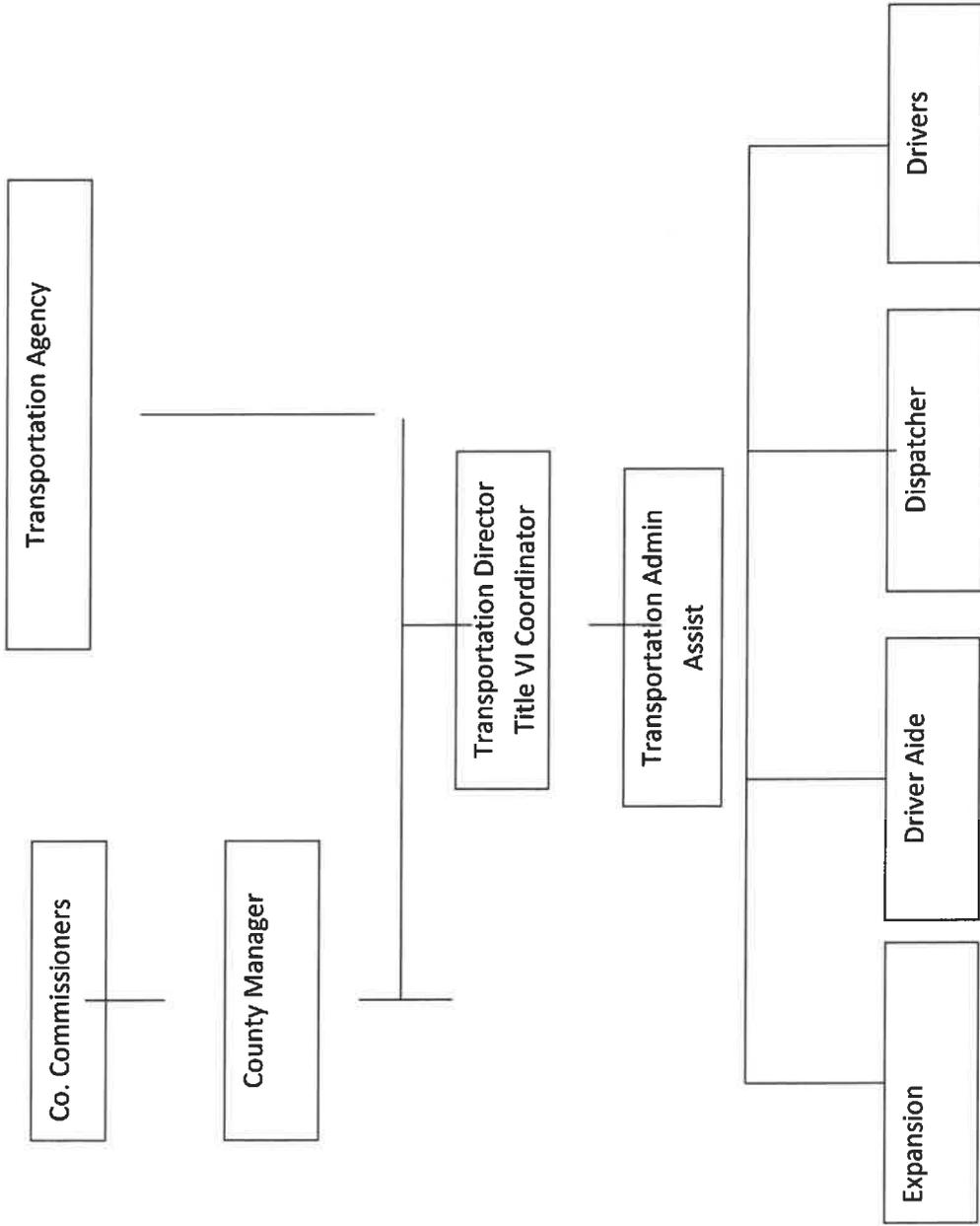
- Investigative Reports
- Discrimination complaint, as filed
- List of interviewees (names and affiliations)
- Supporting Documentation (e.g., requested items, photos taken, dates and methods of contact, etc.)

## Appendix A Applicable Nondiscrimination Authorities

During the implementation of this Title VI Program, the organization, for itself, its assignees and successors in interest, is reminded that it has agreed to comply with the following non-discrimination statutes and authorities, including but not limited to:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 *et seq.*), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.*), (prohibits discrimination on the basis of age);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 *et seq.*).
- Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e *et seq.*, Pub. L. 88-352), (prohibits employment discrimination on the basis of race, color, religion, sex, or national origin);
- 49 CFR Part 26, regulation to ensure nondiscrimination in the award and administration of DOT-assisted contracts in the Department's highway, transit, and airport financial assistance programs;
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq.*), (prohibits discrimination on the basis of sex);
- Airport and Airway Improvement Act of 1982, (49 USC § 4 71, Section 4 7123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex).

**Appendix B  
Organizational Chart**



**Appendix C**  
**NCDOT's Compliance Review Checklist for Transit**

<b>I. Program Administration (General Requirements)</b>	
<i>Requirement: FTA C 4702.1B – Title VI Requirements and Guidelines for FTA Recipients, Chapter III – General Requirements and Guidelines.</i>	
<b>Note:</b> Every NCDOT sub recipient receiving any of the FTA Formula Grants listed above must complete this section.	
Requested Items (Please attach electronic documents (.pdf, .doc, etc.) or provide links to online versions)	Completed
1. A copy of the recipient's <i>signed</i> NCDOT's Title VI Nondiscrimination Agreement	<input type="checkbox"/>
2. Title VI Policy Statement ( <i>signed</i> )	<input type="checkbox"/>
3. Title VI Notice to the Public, including a list of locations where the notice is posted	<input type="checkbox"/>
4. Type the name and title of your Title VI Coordinator and attach a list of their Title VI duties <b>Name/Title:</b>	<input type="checkbox"/>
5. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)	<input type="checkbox"/>
6. Title VI Complaint Form	<input type="checkbox"/>
7. List of transit-related Title VI investigations, complaints, and lawsuits (i.e., discrimination complaints log)	<input type="checkbox"/>
8. Public Participation Plan, including information about outreach methods to engage traditionally underserved constituencies (e.g., minorities, limited English proficient populations (LEP), low-income, disabled), as well as a summary of outreach efforts made since the last Title VI Program submission	<input type="checkbox"/>
9. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance, which requires conducting four-factor analyses	<input type="checkbox"/>
10. 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	<input type="checkbox"/>
11. 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 <b>reviewed and approved</b> the Title VI Program	<input type="checkbox"/>
12. A description of the procedures the agency uses to ensure nondiscriminatory administration of programs and services	<input type="checkbox"/>
13. <b>If you pass through FTA funds to other organizations</b> , include a description of how you monitor your sub recipients for compliance with Title VI, and a schedule for your sub recipients' Title VI Program submissions. ➤ No Sub recipients <input type="checkbox"/>	<input type="checkbox"/>
14. A Title VI equity analysis <b>if you have constructed or conducted planning for a facility</b> , such as a vehicle storage facility, maintenance facility, operation center, etc. ➤ No Facilities Planned or Constructed <input type="checkbox"/>	<input type="checkbox"/>
15. Copies of environmental justice assessments conducted for <b>any construction projects during the past three years</b> and, if needed based on the results, a description of the program or other measures used or planned to mitigate any identified adverse impact on the minority or low-income communities ➤ No Construction Projects <input type="checkbox"/>	<input type="checkbox"/>



APPENDIX D

APPENDIX D