



TITLE VI

DURHAM-CHAPEL HILL-CARRBORO METROPOLITAN PLANNING ORGANIZATION (DCHC MPO)

2019 UPDATE

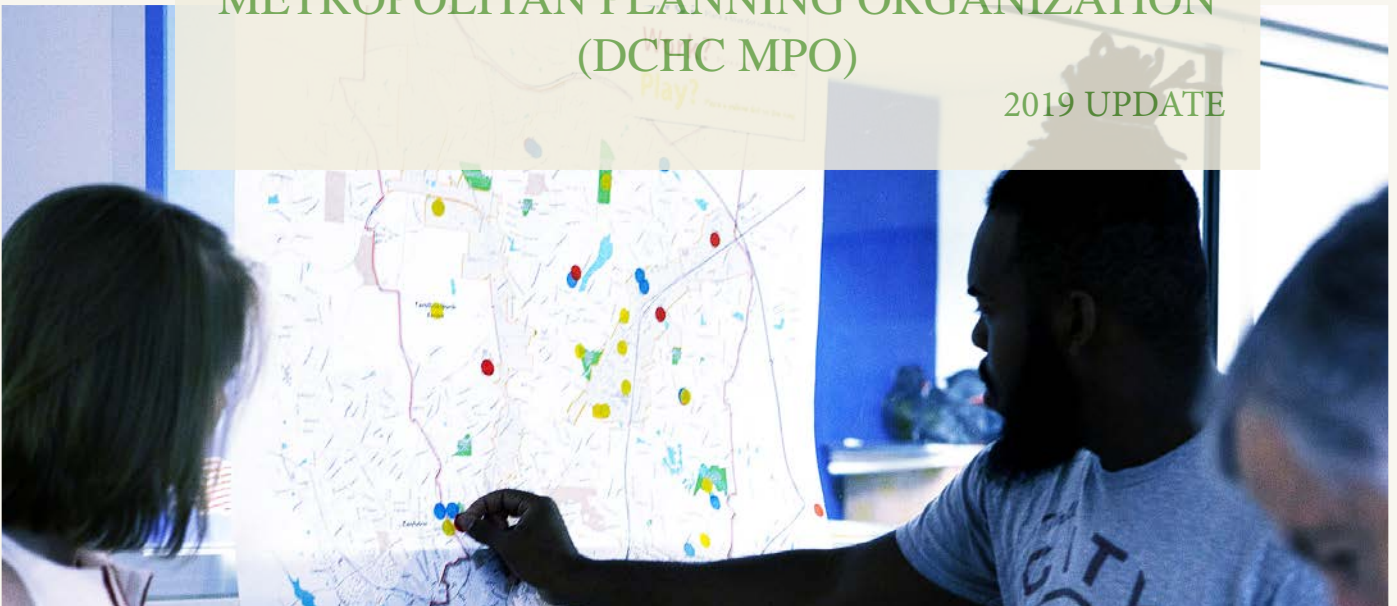


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TITLE VI POLICY STATEMENT AND NOTICE OF NONDISCRIMINATION

It is the policy of the Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (DCHC MPO), as a federal-aid recipient, to ensure that no person shall, on the ground of race, color, national origin, Limited English Proficiency, sex, age, or disability, (and low-income, where applicable), 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, Executive Orders 12898 and 13166, the Civil Rights Restoration Act of 1987, and other pertinent nondiscrimination authorities.

If you feel you have been subjected to discrimination, you may file a complaint. Allegations of discrimination should be promptly reported to our Title VI Coordinator.

Name of Title VI Coordinator: Vacant
Physical Address: City of Durham, DCHC-MPO/Transportation,
4th Floor, 101 City Hall Plaza, Durham, NC 27701
Phone: xxx-xxx-xxxx, ext.xxxxx
Email: xxxxx.yyyyy@durhamnc.gov

This policy is an expression of our commitment to nondiscrimination and support of the Title VI Program.

Felix Nwoko, MPO Administrator
(Executive Director)

Date

Implementation (Dissemination)

- This Policy Statement contains contact information for the Title Coordinator, and it will also serve as our notice to public.
- This statement will be signed by the MPO Administrator/Executive Director of the DCHC-MPO, 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, and disseminated within brochures and other written materials.
- The statement will be incorporated into Title VI training and acknowledgment activities.
- The statement will be posted or disseminated in languages other than English, when appropriate.
- Low-income will be applicable to our programs, policies and activities under Environmental Justice when determining if there will be disproportionately high and adverse effects.

STANDARD USDOT TITLE VI ASSURANCES

The Durham-Chapel Hill-Carrboro Metropolitan Planning Organization -DCHC MPO (hereinafter referred to as the “Recipient”) HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the North Carolina Department of Transportation and the US Department of Transportation it will comply with the Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation. Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, sex, age, national origin or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) (1) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal-Aid Highway Program:

1. That the Recipient agrees that each “program” and each “facility” as defined in subsections 21.23 (b) and 21.23 (e) of the Regulations, will be (with regard to a “program”) conducted, or will be (with regard to a “facility”) operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with the Federal-Aid Highway Program and, in adapted form in all proposals for negotiated agreements:

The DCHC MPO in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority 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, or national origin in consideration for an award.

3. That the Recipient shall insert the clauses of *Appendix A* of this assurance in every contract subject to the Act and the Regulations.
4. That the Recipient shall insert the clauses of *Appendix B* of this assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.

5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.
7. That the Recipient shall include the appropriate clauses set forth in *Appendix C* of this assurance, as a covenant running with land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under the Federal-Aid Highway Program; and (b) for the construction or use of or access to space on, over or under real property acquired, or improved under the Federal-Aid Highway program.
8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient under the Federal-Aid Highway Program and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest and other participants in the Federal-Aid Highway Program. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

Felix Nwoko,
Manager/Administrator, DCHC MPO

Signature and Date

Please refer to *Appendix A* of this Plan for a copy of our completed, signed USDOT Title VI Assurances.

ORGANIZATION & STAFFING

A Metropolitan Planning Organization (MPO) is the policy board of an organization created and designated to carry out the metropolitan transportation planning process. MPOs are required to represent localities in all urbanized areas (UZAs) with populations over 50,000, as determined by the U.S. Census. MPOs are designated by agreement between the governor and local governments that together represent at least 75 percent of the affected population (including the largest incorporated city, based on population) or in accordance with procedures established by applicable state or local law. When submitting a transportation improvement program to the state for inclusion in the statewide program, MPOs self-certify that they have met all federal requirements.

An urbanized area with a population over 200,000, as defined by the Bureau of the Census and designated by the Secretary of the U.S. Department of Transportation (DOT), is called a Transportation Management Area (TMA). As described in 49 U.S.C. 5303(k), and in recognition of the greater complexity of transportation issues in large urban areas, an MPO in a TMA has a stronger voice in setting priorities for implementing projects listed in the transportation improvement program and are responsible for additional planning products. The planning processes in MPOs in TMAs also must be certified by the Secretary of DOT as being in compliance with federal requirements.

The Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (DCHC MPO) was established in 1980. MPO has 18 members, and meets monthly on the second Wednesday of the month. Our Technical Committee (TC) has 31 members, and meets monthly on the fourth Wednesday of the Month. Please refer to *Appendix E* for lists of current MPO Board and TC members with race, gender, and affiliation included.

Title VI Coordinator

1. Key responsibilities of the Coordinator include:

- Maintaining knowledge of Title VI and related requirements.
- Attending civil rights training when offered by NCDOT, FHWA or other federal agencies.
- Administering the Title VI Nondiscrimination Program and coordinating implementation of this Plan.
- Making sure internal staff and officials are familiar and complying with their Title VI obligations.
- Disseminating Title VI information internally and to the 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 under-served groups are included and not discriminated against.
- Ensuring that non-elected boards and committees reflect the service area and minorities are represented.
- Promptly processing (receiving, logging, investigating and/or forwarding) discrimination complaints.
- Providing information to NCDOT and cooperating during compliance reviews and investigations.
- Promptly resolving deficiencies to ensure compliance with Title VI nondiscrimination requirements.

If the Executive Director or Title VI Coordinator changes, the Title VI Policy Statement and USDOT Title VI Assurances, will immediately be updated, and

an updated policy statement (and nondiscrimination agreement, if standalone) will be signed by the new Executive Director.

Staffing

We currently employ a staff of eleven, which consists of the following job categories:

- Executive Director
- Senior Transportation Planner
- GIS / Website/Application Coordinator
- Transportation Planner II
- Bicycle Pedestrian Planner

- Transportation Technician
- Transportation Modeler
- Transportation Modeler
- Senior Transportation Planner
Grant Admin
- System Engineer (modeling)
- Intern(s)

A chart showing the Title VI Coordinator's place within the organization is located in *Appendix F*

ENVIRONMENTAL JUSTICE (EJ)

In 1994, President William Jefferson Clinton issued Executive Order (EO) 12898, Federal Actions to Address Environmental Justice (EJ) in Minority Populations and Low-Income Populations. To comply with the EO, federal agencies developed EJ guidelines for their funding recipients, including Federal Highway Administration (FHWA) Order 6640.23A. Accordingly, the DCHC MPO will make achieving EJ part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income populations.

EJ is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation and enforcement of environmental laws, regulations and policies. The three fundamental EJ principles that guide USDOT (affiliated) actions are:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including interrelated social and economic effects, on minority and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

To achieve EJ, our programs will be administered so as to identify and avoid disproportionately high and adverse effects on minority populations and low-income populations by:

1. Identifying and evaluating environmental, public health, and interrelated social and economic effects

of our programs, policies and activities;

2. Proposing measures to avoid, minimize and/or mitigate disproportionately high and adverse environmental and public health effects, and interrelated social and economic effects, and providing offsetting benefits and opportunities to enhance communities, neighborhoods, and individuals affected by our programs, policies and activities, where permitted by law;
3. Considering alternatives to proposed programs, policies, and activities, where such alternatives would result in avoiding and/or minimizing disproportionately high and adverse human health or environmental impacts to minority and/or low-income populations; and
4. Eliciting public involvement opportunities and considering the results thereof, including soliciting input from affected minority and low-income populations in considering alternatives.
5. Adding an EJ section to plans and studies, such as Long Range Plans, CTP, MTP, TIP, project development/NEPA, sub-area, Public Involvement Plans, and Corridor Studies.
6. EJ analyses will be conducted to determine if our programs, policies, or activities will result in disproportionately high and adverse human health and environmental effects on minority populations and low-income populations. EJ applies to our policies, such as where public meetings will be held, and our projects, such as when we plan to construct or expand a facility. Thus, we will look at various alternatives and seek input from potentially affected communities before making a final decision. Demographic data will be collected to document public involvement in the decision-making process. EJ analyses will remain on file indefinitely, and copies will be provided to NCDOT, upon request, during compliance reviews or complaint investigations. (See *Appendix G – Tables for Race/Ethnicity and Poverty*)

DATA COLLECTION/ANALYSIS/ REPORTING

Data collection, analysis and reporting are key elements of a successful Title VI enforcement strategy. To ensure that Title VI reporting requirements are met, DCHC MPO will collect and maintain data on potential and actual beneficiaries of our programs and services. This section contains relevant population data for our overall service area. The data provides context for the Title VI Nondiscrimination Program and will be used to ensure nondiscrimination in public outreach and delivery of our programs. Please refer to See *Appendix G* for

demographic tables on Race & Ethnicity, Age & Sex, Disability, Poverty, and Household Income.

POPULATION LOCATIONS

Recipients of FHWA funds are required to identify the characteristics and locations of populations they serve, particularly by race/ethnicity, poverty and limited English proficiency. We will document this narratively or through maps that overlay boundaries and demographic features on specific communities, and provide this information to NCDOT, upon request. (See *Appendix H – Demographic Maps*)

LIMITED ENGLISH PROFICIENCY (LEP)

Limited English Proficient (LEP) persons are individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. These individuals reported to the U.S. Census Bureau that they speak English less than very well.

To comply with USDOT's LEP Policy Guidance and Executive Order 13166, this section of our Title VI Plan outlines the steps Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (DCHC MPO) will take to ensure meaningful access by LEP persons to all benefits, services and information provided under our programs and activities. A four factor analysis was conducted to determine the LEP language groups present in our planning area and the specific language services that are needed.

FOUR FACTOR ANALYSIS

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

1. 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. The frequency with which LEP individuals come in contact with the program;
3. The nature and importance of the program, activity, or service provided by the recipient to people's

lives; and

4. The resources available to the recipient and costs.

FACTOR #1

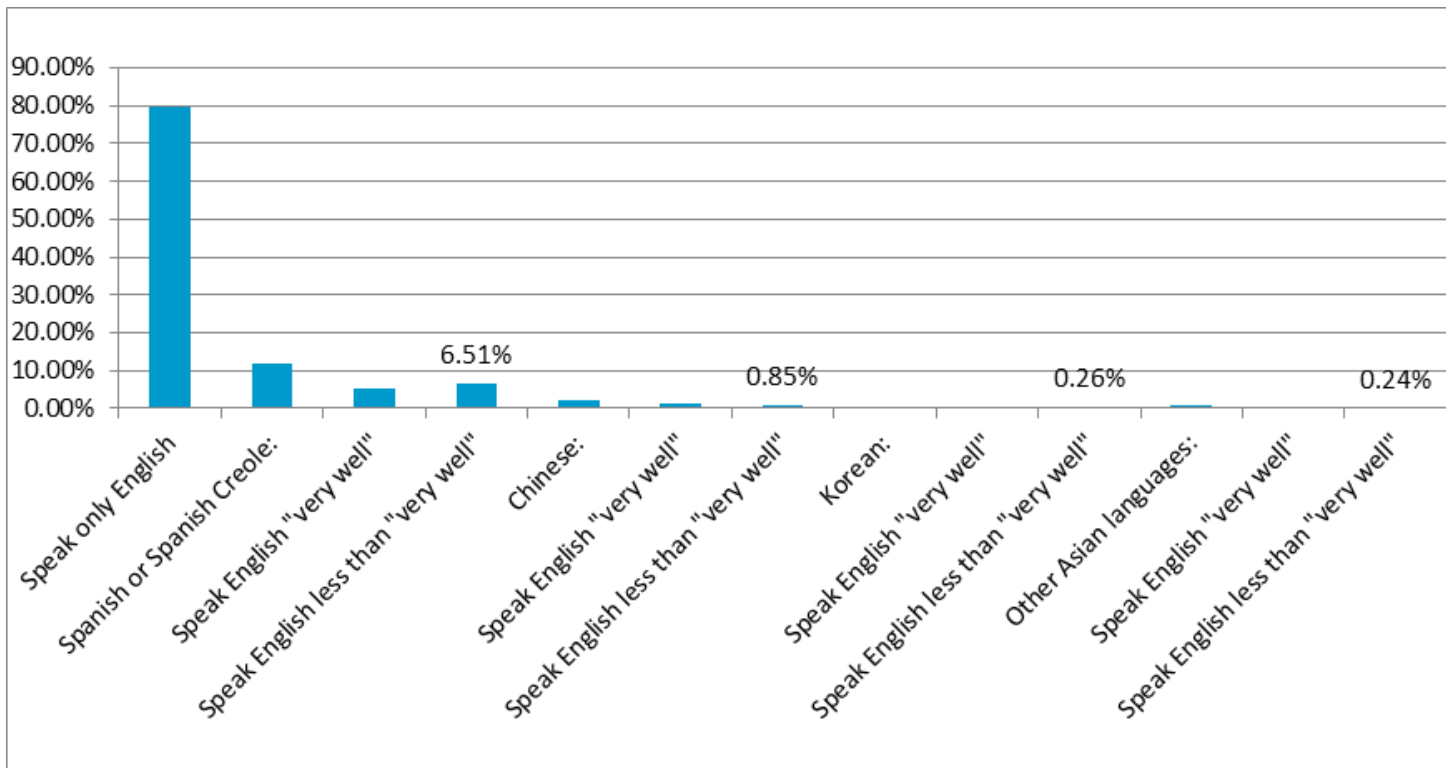
The number or proportion of LEP persons eligible to be served or likely to be encountered by the program, activity, or service of the recipient.

This Title VI update requires that the MPO recognize the sub-populations of languages that have either more than 5 % or 1,000 people that speak English less than "very well" including numbers in the Margin of Error. In the Durham-Chapel Hill-Carrboro Metropolitan Planning Organization service area, the largest language subpopulation within the LEP population was that of Spanish speakers who speak English less than "very well." Referencing estimates from the 2015 5-year American Community Survey (ACS), our area has a total of 345,028 people. There are 40,834 Spanish speakers, of whom 22,470 speak English less than "very well", or just over 6% of the total population. Speakers of Chinese that speak English less than "very well" was estimated at 2,925, or 0.85 % of the population, and Korean speakers, while estimated at 914, included a +/-256 person margin of error, for a total of 1,160 Korean speakers. The following tables and charts display LEP information for the Durham Urbanized Area and the three counties that are part of the area (Durham, Orange and Chatham). See *Appendix D* for other demographic information, including maps and US Census data as retrieved from factfinder.census.gov in the preparation of this report.

DCHC MPO (Durham Urbanized Area) LEP Summary Table

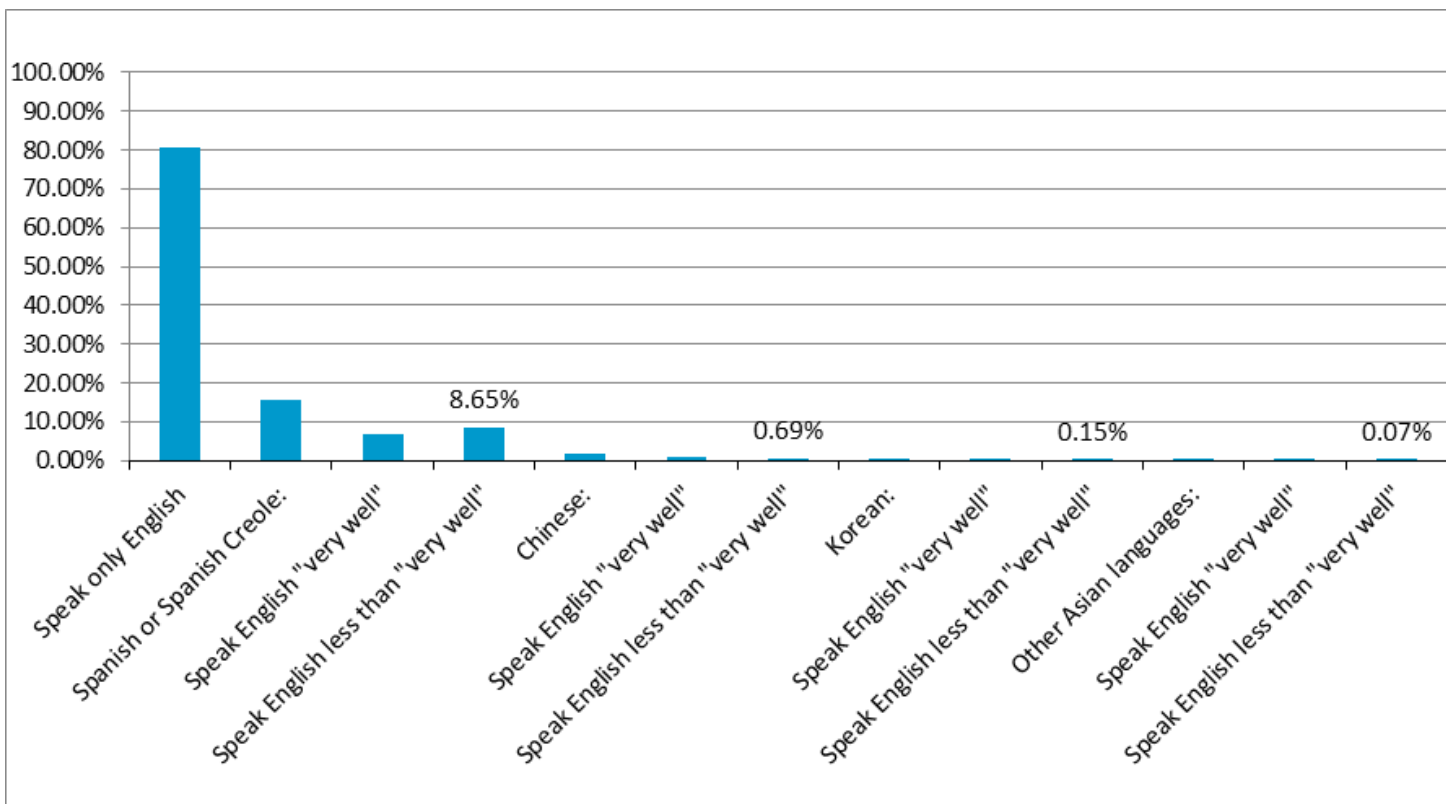
Speak English Less than "Very Well"	Estimate	Margin of Error	Percent of Population	Margin of Error
Total (population 5 years and over):	345,028	+/-1,551	100.00%	
Spanish or Spanish Creole	22,470	+/-1,120	6.51%	4.98%
Chinese	2,925	+/-472	0.85%	16.14%
Korean	914	+/-256	0.26%	28.01%
Other Asian Languages	816	+/-325	0.24%	39.83%

DCHC MPO (Durham Urbanized Area) LEP Characteristics



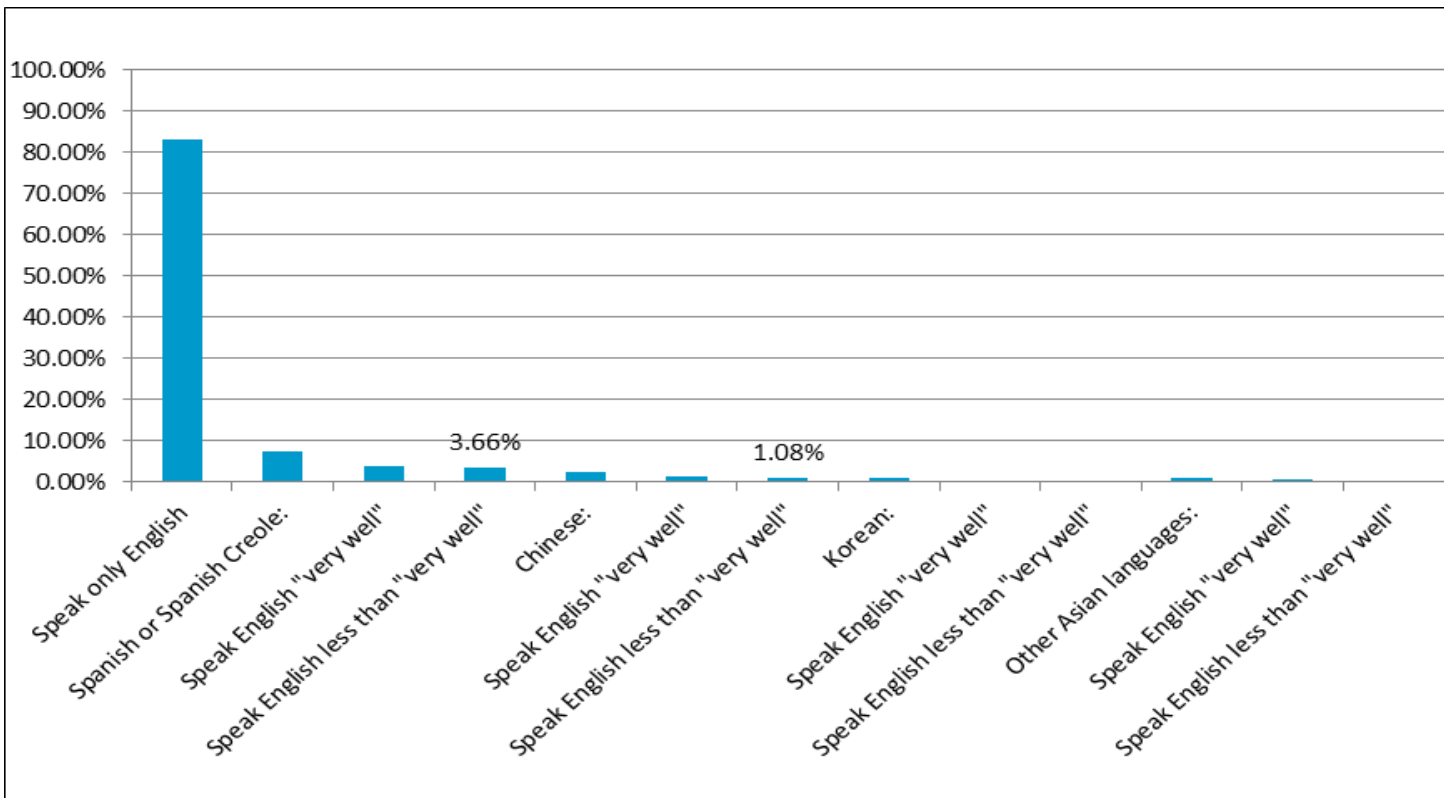
LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
Total (population 5 years and over):	345,028	+/-1,551	100.00%	(x)
Speak only English	274,755	+/-1,864	79.63%	0.68%
Spanish or Spanish Creole:	40,834	+/-1,092	11.83%	2.67%
Speak English "very well"	18,364	+/-1,214	5.32%	6.61%
Speak English less than "very well"	22,470	+/-1,120	6.51%	4.98%
Chinese:	6,671	+/-725	1.93%	10.87%
Speak English "very well"	3,746	+/-554	1.09%	14.79%
Speak English less than "very well"	2,925	+/-472	0.85%	16.14%
Korean:	1,996	+/-513	0.58%	25.70%
Speak English "very well"	1,082	+/-419	0.31%	38.72%
Speak English less than "very well"	914	+/-256	0.26%	28.01%
Other Asian languages:	2,397	+/-643	0.69%	26.83%
Speak English "very well"	1,581	+/-413	0.46%	26.12%
Speak English less than "very well"	816	+/-325	0.24%	39.83%

Durham County LEP Characteristics



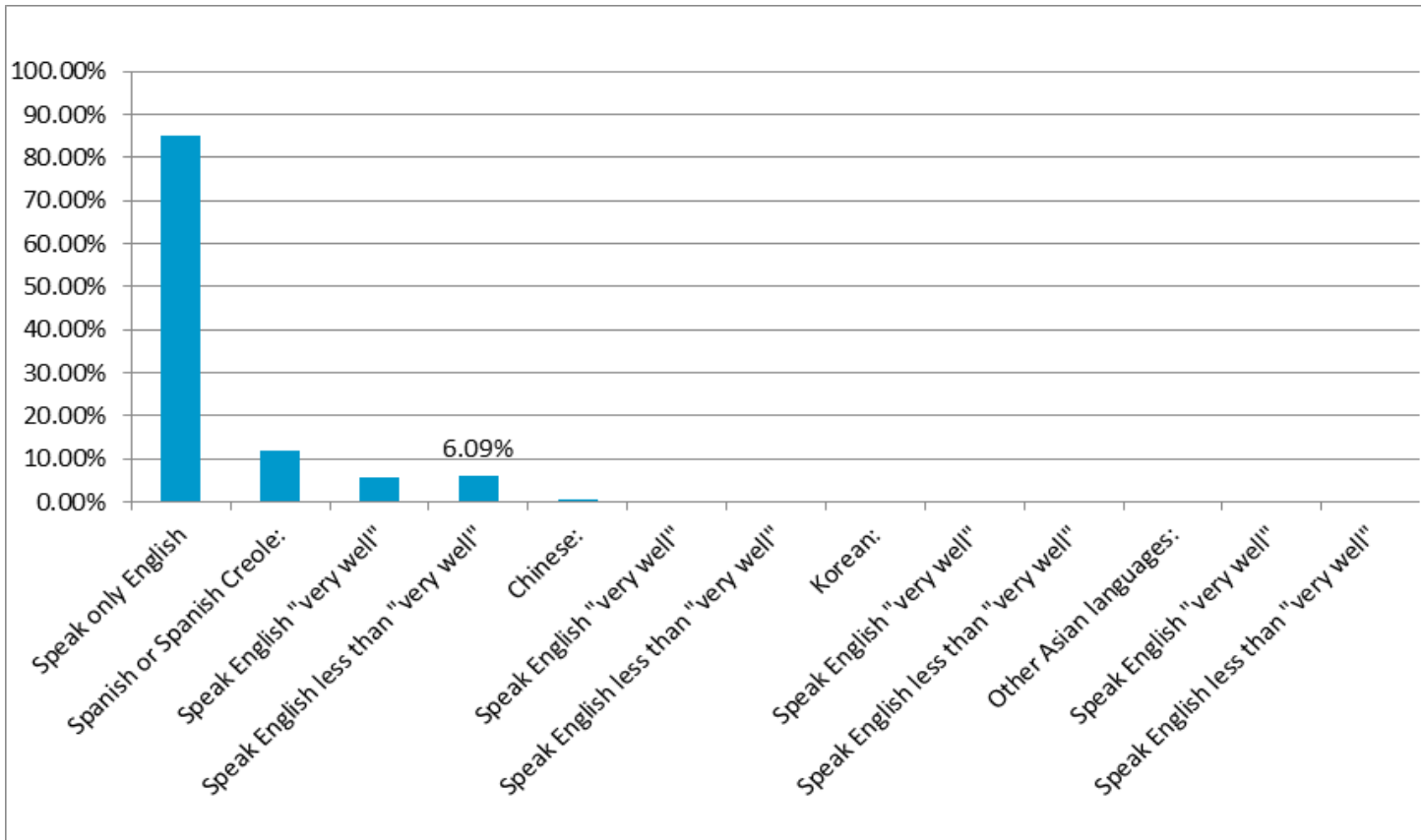
LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
Total (population 5 years and over):	268,210	+/-80	100.00%	(x)
Speak only English	216,104	+/-1,165	80.57%	0.54%
Spanish or Spanish Creole:	33,401	+/-782	15.46%	2.34%
Speak English "very well"	14,705	+/-1,042	6.80%	7.09%
Speak English less than "very well"	18,696	+/-1,064	8.65%	5.69%
Chinese:	3,476	+/-515	1.61%	14.82%
Speak English "very well"	1,979	+/-344	0.92%	17.38%
Speak English less than "very well"	1,497	+/-334	0.69%	22.31%
Korean:	868	+/-319	0.40%	36.75%
Speak English "very well"	535	+/-262	0.25%	48.97%
Speak English less than "very well"	333	+/-166	0.15%	(X)
Other Asian languages:	852	+/-276	0.39%	32.39%
Speak English "very well"	693	+/-240	0.32%	34.63%
Speak English less than "very well"	159	+/-108	0.07%	67.92%

Orange County LEP Characteristics



LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
Total (population 5 years and over):	132,093	+/-24	100.00%	(x)
Speak only English	109,970	+/-805	83.25%	0.73%
Spanish or Spanish Creole:	9,777	+/-453	7.40%	4.63%
Speak English "very well"	4,939	+/-502	3.74%	10.16%
Speak English less than "very well"	4,838	+/-539	3.66%	11.14%
Chinese:	3,227	+/-511	2.44%	15.84%
Speak English "very well"	1,795	+/-415	1.36%	23.12%
Speak English less than "very well"	1,432	+/-359	1.08%	25.07%
Korean:	1,257	+/-440	0.95%	35.00%
Speak English "very well"	637	+/-354	0.48%	55.57%
Speak English less than "very well"	620	+/-203	0.47%	32.74%
Other Asian languages:	1,531	+/-538	1.16%	35.14%
Speak English "very well"	903	+/-319	0.68%	35.33%
Speak English less than "very well"	628	+/-320	0.48%	50.96%

Chatham County LEP Characteristics



LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Pop-ulation	Margin of Error
Total (population 5 years and over):	63,978	+/-1,551	100.00%	(x)
Speak only English	54,539	+/-1,864	85.25%	3.42%
Spanish or Spanish Creole:	7,659	+/-1,092	11.97%	14.26%
Speak English "very well"	3,762	+/-1,214	5.88%	32.27%
Speak English less than "very well"	3,897	+/-1,120	6.09%	28.74%
Chinese:	417	+/-725	0.65%	173.86%
Speak English "very well"	202	+/-554	0.32%	274.26%
Speak English less than "very well"	215	+/-472	0.34%	219.53%
Korean:	51	+/-513	0.08%	1005.88%
Speak English "very well"	51	+/-419	0.08%	821.57%
Speak English less than "very well"	0	+/-256	0.00%	(X)
Other Asian languages:	48	+/-643	0.08%	1339.58%
Speak English "very well"	19	+/-413	0.03%	2173.68%
Speak English less than "very well"	29	+/-325	0.05%	1120.69%

FACTOR #2:

The frequency with which LEP individuals come in contact with the program.

The DCHC MPO assesses 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. MPO transit operators also provide outreach to the Spanish population. The MPO provides Spanish translation for public meetings and outreach materials. Arrangements are made to provide translation when requested.

FACTOR #3:

The nature and importance of the program, activity, or service provided by the recipient to people's lives.

The MPO ensures that all segments of the population, including LEP persons, have been involved, or have the opportunity to become involved, in the transportation planning process. The impact of proposed transportation investments on under-served and underrepresented population groups is part of the evaluation process for use of federal funds in three major areas:

1. an annual unified planning work program;
2. a seven-year transportation improvement program;
3. a long-range transportation plan covering 20+ years.

Inclusive public participation is a priority in other MPO plans, studies, and programs as well. The impacts of transportation improvements resulting from these planning activities have an impact on all residents. Understanding and involvement are encouraged throughout the process and the MPO is concerned with input from all stakeholders. Every effort is made to make the planning process as inclusive as possible.

Progress towards project planning and construction under the responsibility of NCDOT is coordinated with the MPO. NCDOT has its own policies to ensure that LEP individuals participate in the project planning. To assess the nature and importance of the programs, activities, and services provided by DCHC MPO to LEP and general community, the DCHC MPO conducted both an internal and external review:

Internal Review

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

- Metropolitan Transportation Plan
- Transportation Improvement Plan
- Unified Planning Work Program
- Public Involvement Policy

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 DCHC MPO plans and programs. Translation and/or interpretation services, for Spanish and other languages, will be considered upon request and in coordination with partner agencies in the region. Furthermore, public meeting notices would be classified as vital documents requiring translation services. To facilitate the translation process for public meeting notices, the staff will prepare a template for the selected primary LEP language. 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 as described previously, to include translating notices and key information contained within vital documents.

Externally, a public outreach effort within the identified language communities will be conducted. Community groups that work with the Spanish populations will be contacted for their input. In this outreach, the Durham-Chapel Hill-Carrboro Metropolitan Planning

Organization staff will provide community groups a synopsis of what the primary purpose and functions of the DCHC MPO 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 appropriate agency and/or locality as applicable.

Quarter	Calls Received	Calls Answered	Calls Abandoned	Total % Calls Answered	Estimated Total LEP Calls
7/1/10 - 9/30/10	108,662	104,751	3,911	96.4%	109
10/1/10 - 12/31/10	124,500	117,166	7,334	94.1%	125
1/1/11 - 3/31/11	118,347	110,303	8,044	93.2%	118
4/1/11 - 6/30/11	116,413	110,769	5,644	95.2%	117
TOTAL	467,922	442,989	24,933	94.7%	469
FY10 Total	370,898	362,437	8,461	97.7%	371
% Change	26.2%	22.2%	194.0%	-3.1%	21%

*Call Center data is being updated in January 2019.

Phone Call Distribution by Individual Transit Systems

Agency	Percentage of Calls*	Estimated Calls in FY11**
CAT	65.2%	303,892
DATA	13.9%	64,787
Triangle Transit	12.9%	60,126
Cary Transit	3.0%	13,983
Chapel Hill Transit	4.9%	22,839

*Based on a sample of over 70,000 phone calls received in 2011.

Customer Feedback Totals

Agency	Complaints	Commendations	Totals	Estimates
CAT	628	29	657	3.0
DATA	424	19	443	4.0
Triangle Transit	393	45	438	4.0
Cary Transit	19	1	20	0.2
Chapel Hill Transit	101	6	107	0.1
Regional Call Center	27	14	41	0.3

FACTOR #4

The resources available to the recipient and costs.

MPO transit operators are constantly looking for ways to improve communication and enhanced contact and accessibility with LEP patrons.

Over the past several years, transit officials organized a public work sessions dedicated to LEP patrons who use their systems. Overall, an average 20 people mostly Spanish speaking attended. Others were from French Speaking Southeast Asia and Africa. The purpose of the meetings was to provide the patrons the opportunity to understand the transit system operations and also afford them insight into the language and outreach needs of the group.

Key Ideas from these meetings are summarized as follows:

- The importance of communicating with these groups through their children, most of whom speak both native languages and English.
- Incorporating images into our communications for those who prefer not to read whether it is in English or Spanish.
- Attending major festivals and events with space or booth to attract visitors - can have games and/or giveaways.
- Using the radio to leverage communications. The radio stations are highly listened to while some are at home or on the jobs. We can work with the DJs to promote educational opportunity for public transit. The community looks up to the DJs.
- The introduction of the transit user advocates or ambassadors program as well as introduction of the citizens meetings to afford riders the opportunity to provide input to various service initiatives that may impact LEP communities.

Other initiatives for improving communication with and accessibility for LEP residents are summarized below:

- A staff appearance on local Radio talk shows and community television, whose guest periodically include Spanish leaders in the community to discuss transit access issues.
- Appearance of city staff on Spanish radio, providing project information in Spanish to listeners;
- An information booth with bilingual staff and project information at various communities and municipal events/festivals;
- Spanish advertisements published in local Spanish papers to announce all project public meetings.

Transit Regional Call Centers and LEP Outreach/Awareness (see note)

Transit operators in the Triangle Region teamed up and established a regional consolidated call center for Triangle residents to access transit service information from a single source. This center has been in operation since 2010 and is currently operated by GoTriangle (formerly Triangle Transit). It has several customer service attendants who take live calls and answer patrons questions related to transit services in the Triangle Region. Over the past 5 years calls have more than quadrupled. An increasing number of these calls now come from riders with Limited English Proficiency or LEP group. To assist this group the center constantly has a bilingual (English & Spanish) call takers to assist the largest LEP population in the triangle for the Spanish speaking population.

Over the past 3 years non-English speaking calls have averaged 1% of all calls received, making it imperative for the service to acknowledge the importance of this population group. In the past two years there have been 185 calls originating from non-English speakers of mostly Spanish origin.

In addition to the life or voice response system transit operators and the Call Center periodically administers

surveys asking patrons to indicate if there was other languages that needed to be covered. So far, French has been the only language that has been requested. Since the request came from a single source the individual was directed to a French-Speaking staff for direct assistance.

INTERPRETATION AND TRANSLATION SERVICES

Latino media outlets and television and radio stations, La Conexion, Que Pasa, Univision, Telefuturo, La Ley and EL Centro, help provide translation and interpretation services to various MPO agencies and transit operators. These media outlets are typically used to resolve public safety needs, to assist with general interpretation and translation, to provide court-certified interpreters, to communicate with the audibly impaired, or to provide language proficiency testing for public safety personnel.

Further, DCHC MPO member agencies use the aforementioned Latino media sources below to offer interpretation and translation services, mostly in Spanish free of charge to the City.

Bus Operator

Currently, no official data is kept by bus drivers on interaction with LEP passengers. However, there are a number of current fixed route bus operators and Customer Service Representatives who are bilingual and who are constantly called upon to assist in the interpretation of various services to our Hispanic patrons as well as the dissemination of information to the same group.

Paratransit Operators

The paratransit operators use mostly the services of the County Social Services which has translator resources for Hispanic community. The Department also works with churches and with the Latino community organizations within the metropolitan area. Brochures,

announcements and news about our paratransit programs relating to our services are sent to this organization for dissemination of in the inbound calls coming through the our scheduler voice response system are sometimes sent to Spanish speaking customer service staffers. In very rare case do the paratransit system utilize Spanish speaking drivers to provide assistance or by request. This is because 99 percent of the paratransit (demand responsive) clients are English speaking patrons. In very rare occasions when a non-English speaking client asks for a service, our in-house Spanish speaking staff is able to offer that assistance.

Transit Security Police Unit

Transit police officers have interpreters available via the above mentioned services, and there are transit officers with fluent multilingual capabilities in Spanish. Generally, officers are taught limited Spanish phrases in BLET. Very few cases involving LEP patrons are reen countered especially in areas such as drugs, guns, robbery and fighting that demand immediate arrest, very few LEP encounters are recoded.

LANGUAGE ASSISTANCE PLAN

As a result of the above four factor analysis, a Language Assistance Plan (Plan) was required. This Plan represents our commitment to ensuring nondiscrimination and meaningful access by persons who are Limited English Proficient (LEP). This Plan also details the mechanisms we will use to reach LEP persons and the language assistance services we provide. We will provide services to any person, upon request. If an individual is LEP, we will work with the individual to ensure they receive the needed transportation service. Our employees will be routinely oriented on the principles and practices of Title VI and LEP to ensure fairness in the administration of this Plan.

LANGUAGE ASSISTANCE MEASURES

The following general language assistance measures are reasonable and achievable for our organization at this time:

Translating public notices posted in the local paper and at stations, stops, and in vehicles into any languages that meet the safe harbor threshold in Factor 1.

- Vital documents—such as brochures with service times and routes—are translated into Spanish across the entire service area, and available in our facilities, doctor's offices and shopping centers.
- Making a concerted effort to inform LEP persons of available language assistance via staff, broadcast media, relationship-building with organizations, and our website.
- Posting vital bulletin board information and disseminating community surveys in various languages.
- Providing translation and interpretive services when appropriate (upon request or predetermined) at meetings.
- Determining how best to take public involvement to LEP groups directly, including through small group meetings.
- Language line translation services at our call center.
- Where possible, utilizing or hiring staff who speak a language other than English and can provide competent language assistance.
 - We will not ask community-based organizations (CBO) to provide, or serve as, interpreters at our meetings. Relying upon CBOs in that capacity could raise ethical concerns. If a CBO decides (on its own) to translate any materials for its constituents, or bring interpreters it trusts to our meetings, we will not object. That is their right.
- Using language identification flashcards to determine appropriate services.
- Establishing a process to obtain feedback on our language assistance measures.

Written Translation and Oral Interpretation

Vital documents will be translated for each eligible LEP language group in our service area that constitutes 5%

or 1,000, whichever is less, of the population of persons eligible to be served or likely to be encountered. Translated materials will be placed online and in appropriate public (or private) places accessible to LEP persons. The safe harbor provisions apply to the translation of written documents only, and do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. When appropriate, translation of any document will be communicated orally in the appropriate language.

In the event that the 5% trigger is reached for a LEP language group that is fewer than 50 persons, written notice will be provided in the primary language of that group of the right to receive competent oral interpretation of vital written materials, free of cost. The most effective method of notice, which could be an ad in the local newspaper or other publication, a radio commercial, or door hangers, will be determined in consideration of the circumstances on the ground and in coordination with LEP community contacts.

Staff Support for Language Assistance

- Our staff (including receptionists and call centers) will be provided a list of referral resources that can assist LEP persons with written translation and oral interpretation, including the Title VI Coordinator and consultants contracted to provide LEP services. This list will be updated as needed to remain current.
- All main offices will have available language assistance flashcards and materials translated into the languages that meet the safe harbor threshold. When encountering an LEP person, staff should present the individual with an iSpeak flashcard and let them choose the language. Do not assume their preferred language. Assistance may be sought from bilingual staff fluent in the identified language before contacting a referral resource. Document the encounter and report it to the Title VI Coordinator.
- Training: All employees will be instructed on our procedures for providing timely and reasonable assistance to LEP persons. New employee

orientation will also explain these procedures to new hires. Staff routinely encountering LEP persons by telephone or in person will receive annual refresher training. All other employees will be reminded of LEP through annual Title VI program acknowledgments and basic Title VI trainings.

Project-Specific LEP Outreach

A project-specific four factor analysis will be conducted for any project or outreach event limited to a specific geographical area (i.e., the project study area or outreach area, respectively). Language assistance will be provided in accordance with the measures already outlined, including translating written materials for each LEP language group that is 5% or 1,000, whichever is less, of the project or outreach area population.

Monitoring and Updating the Language Assistance Plan

Monitoring of daily interactions with LEP persons will be continuous, thus language assistance techniques may be refined at any time. This Plan will be periodically reviewed—at least annually—to determine if our assistance measures and staff training are working. Resource availability and feedback from agency staff and the general public will be factors in the evaluation and any proposed updates. Among other practices, this process will include working with LEP community contacts to determine if our employees are responding appropriately to requests made with limited English or in languages other than English, and observing how agency staff responds to requests, including observing drivers or surveying riders. To the best of our ability, we will attempt to never eliminate a successful existing LEP service. Significant LEP program revisions will be approved or adopted by our board or designated official and dated accordingly. LEP data and procedures will be reviewed and updated at least once every three years.

DISSEMINATION OF TITLE VI INFORMATION

In accordance with 23 CFR 200.9(b)(12) and 49 CFR 21.9(d), Durham-Chapel Hill-Carrboro Metropolitan Planning Organization will utilize community outreach and public education to disseminate Title VI information to our employees, contractors, sub-recipients and the general public. Reasonable steps will be taken to make the public aware of their rights and our obligations under Title VI through, including, but not limited to:

- Visibly posting our Title VI Policy Statement in public areas at our facilities, on our website, at our meetings, and prominently in any documents and reports we distribute;
- Placing notices in newspapers and publications with a large circulation among minority groups in the general vicinity of projects and activities. Ads in newspapers and other publications shall include the following:
 “Durham-Chapel Hill-Carrboro Metropolitan Planning Organization operates without regard to race, color, national origin, limited English proficiency, sex, age or disability. For more information on our Title VI program, or how to file a discrimination complaint, please contact Vacant xxx-xxx-xxxx; xxxx.yyyy@durhamnc.gov.”
- Translating information into languages other than English that meet the LEP safe harbor threshold;
- Incorporating Title VI language into our contracts and agreements (See *Appendix A* for Title VI Contract Language); and
- Ensuring any contractors and sub-recipients we have also disseminate Title VI information.

Please refer to our Public Involvement Plan (PIP) for additional outreach methods we employ to comply with Title VI. Our PIP can be found here: www.DCHCMPO.org.

PUBLIC INVOLVEMENT

Effective public involvement is a key element in addressing Title VI in decision-making. This Public Participation Plan describes how Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (DCHC MPO) will disseminate vital agency information and engage the public. We will seek out and consider the input and needs of interested parties and groups traditionally under-served by transportation systems who may face challenges accessing our services, such as minority and limited English proficient (LEP) persons. Underlying these efforts is our commitment to determining the most effective outreach methods for a given project or population.

General public involvement practices will include:

- Expanding traditional outreach methods. Think outside the box: Go to hair salons, barbershops, street fairs, etc.
- Providing for early, frequent and continuous engagement by the public.
- Use of social media and other resources as a way to gain public involvement.
- Coordinating with community- and faith-based organizations such as the Hispanic Liaison, 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.

PUBLIC NOTIFICATION

We will inform people 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. Additional measures may include verbally announcing 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.

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.

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 under-served 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.
- Surveys will be translated into languages other than English, when appropriate.

EXTERNAL DISCRIMINATION COMPLAINT PROCEDURES

These discrimination complaint procedures outline the process used by Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (DCHC MPO) to process complaints of alleged discrimination filed under Title VI of the Civil Rights Act of 1964 and related nondiscrimination laws that are applicable to DCHC MPO programs, services, and activities. Complaints will be investigated by the appropriate authority. Upon completion of an investigation, the complainant will be informed of all avenues of appeal. Every effort will be made to obtain early resolution of complaints at the lowest level possible by informal means.

FILING OF COMPLAINTS

1. **Applicability** – These procedures apply to the beneficiaries of our programs, activities, and services, such as the members of the public and any consultants/contractors we hire.
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, national origin, sex, age, or disability, may file a written complaint. 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.
4. Complaints may be submitted to the following

entities:

- Durham-Chapel Hill-Carrboro Metropolitan Planning Organization; Title VI Program, 101 City Hall Plaza, 4th Floor Transportation, Durham, NC 27701
- North Carolina Department of Transportation, Office of Civil Rights, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or toll free 800-522-0453
- Federal Highway Administration, North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010
- 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
- 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
- **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. **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.

1. When a complaint is received, an Acknowledgment Letter and a Complainant Consent/Release Form will be mailed to the complainant within ten (10) business days by registered mail.
2. We will consult with the NCDOT Title VI Program to determine the acceptability and jurisdiction of all complaints received. (Note: If NCDOT will investigate, the Title VI Program will be responsible for the remainder of this process. We will record the transfer of responsibility in our 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, we 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 our 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.
7. The MPO policy board will be notified about any complaints that are received.

Protected Categories	Definition	Examples	Applicable Statutes and Regulations
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. (Executive Order 13166)
Color	Color of skin, including shade of skin within a racial group	Black, White, brown, yellow, etc.	
National Origin (LEP)	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, para-amputee, epileptic, diabetic, arthritic	Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990

logged).

Complaint Log

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

3. When reporting no complaints, check the No Complaints or Lawsuits box and sign the log.

Please refer to *Appendix I* for a copy of our Discrimination Complaint Form, Complaints Log, and Sample Investigation Template.

REVIEW OF ORGANIZATIONAL DIRECTIVES

It is the responsibility of every official who develops policies, procedures, manuals, guidelines, and other directives to ensure they have been reviewed for Title VI compliance. All staff members will assist in carrying out this requirement by making sure drafts of these documents are submitted to the Title VI Coordinator to ensure Title VI requirements are included.

TITLE VI 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 how Title VI applies to 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, such as agendas, sign-in sheets, copies of calendars, and certificates, will remain on file for at least three years (and in personnel files).

COMPLIANCE AND ENFORCEMENT PROCEDURES

FHWA recipients must have mechanisms in place to enforce compliance with Title VI. Durham-Chapel Hill-Carrboro Metropolitan Planning Organization utilizes internal training, meetings, monitoring contractors,

technical assistance, and findings from periodic NCDOT reviews to identify deficiencies and potential discrimination. If NCDOT identifies deficiencies, Durham-Chapel Hill-Carrboro Metropolitan Planning Organization will correct all deficiencies within 90 days based on a Corrective Action Plan (CAP). If attempts by NCDOT to resolve a compliance issue are unsuccessful, NCDOT may take any or all of the following steps with FHWA's concurrence:

- a. Canceling, terminating, or suspending the contract or agreement in whole or in part;
- b. Refraining from extending any further assistance to the recipient under the program with respect to which the failure or refusal occurred until satisfactory assurance of future compliance has been received from the recipient.
- c. Taking such other action that may be deemed appropriate under the circumstances, until compliance or remedial action has been accomplished by the recipient.
- d. Referring the case to the FHWA for appropriate administrative or legal proceedings.
- e. Other means authorized by law.

To ensure compliance with Title VI, Durham-Chapel Hill-Carrboro Metropolitan Planning Organization will take proactive steps to prevent discrimination in our programs and activities, including the following:

Conduct periodic Title VI training;

- Address Title VI issues at staff meetings;
- Participate or cooperate during compliance reviews conducted by NCDOT;
- Inform and monitor any consultants/contractors regarding their Title VI obligations, including review of contracts for nondiscrimination language;
- Customize public outreach according to the situation or community at hand;



- Build a system of mutual trust and two-way communication with the public;
- Maintain pertinent demographic data (statistical);
- Ensure policies and procedures support and comply with Title VI;
- Document processes & activities related to Title VI.

If Durham-Chapel Hill-Carrboro Metropolitan Planning Organization identifies compliance issues with our

consultants/contractors, we will also take corrective action. If attempts at corrective action are unsuccessful, any or all of the following steps may be taken with NCDOT's concurrence:

- a. Canceling, terminating, or suspending the contract or agreement with the consultant/contractor in whole or in part.
- b. Taking such other action that may be deemed appropriate under the circumstances.

APPENDIX



APPENDIX A
United States Department of Transportation
STANDARD TITLE VI / NONDISCRIMINATION ASSURANCES

DOT Order No. 1050.2A

The Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (herein referred to as the “Recipient”), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through **Federal Highway Administration (FHWA)**, is subject to and will comply with the following:

Statutory/Regulatory Authorities

- 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);
- 49 C.F.R. Part 21 (entitled Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964).

The preceding statutory and regulatory cites hereinafter are referred to as the “Acts” and “Regulations,” respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, for which the Recipient receives Federal financial assistance from DOT, including the Federal Highway Administration.”

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Nondiscrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these nondiscrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted **Federal-Aid Highway Program**:

1. The Recipient agrees that each “activity,” “facility,” or “program,” as defined in §§ 21.23(b) and 21.23(e)

of 49 C.F.R. § 21 will be (with regard to an “activity”) facilitated, or will be (with regard to a “facility”) operated, or will be (with regard to a “program”) conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal-Aid Highway Program and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

“The Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (DCHCMPO) , in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.”

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
 - a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - b. the period during which the Recipient retains ownership or possession of the property.



9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, the *North Carolina Department of Transportation* also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the **FHWA** access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the **FHWA**. You must keep records, reports, and submit the material for review upon request to **FHWA**, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The *North Carolina Department of Transportation* gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the **Federal-Aid Highway Program**. This ASSURANCE is binding on the *State of North Carolina*, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the **Federal-Aid Highway Program**. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (DCHC MPO)

by _____

Damon Seils

Chair DCHC MPO Board

DATED _____

by _____

Felix Nwoko

DCHC MPO Administrator

DATED _____

APPENDIX B: CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the *North Carolina Department of Transportation (NCDOT)* will accept title to the lands and maintain the project constructed thereon in accordance with the North Carolina General Assembly, the Regulations for the Administration of the Federal-Aid Highway Program, and the policies and procedures prescribed by the Federal Highway Administration of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the U.S Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the *NCDOT* all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto the *North Carolina Department of Transportation (NCDOT)* and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the *NCDOT*, its successors and assigns.

The *NCDOT*, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that the *NCDOT* will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [, and (3) that in the event of breach of any of the above-mentioned nondiscrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

APPENDIX C: CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the *North Carolina Department of Transportation (NCDOT)* pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add “as a covenant running with the land”] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Nondiscrimination covenants, the *NCDOT* will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Nondiscrimination covenants, the *NCDOT* will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the *NCDOT* and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX D: CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the *North Carolina Department of Transportation (NCDOT)* pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, “as a covenant running with the land”) that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non- discrimination covenants, the *NCDOT* will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Nondiscrimination covenants, the *NCDOT* will there upon revert to and vest in and become the absolute property of the *NCDOT* and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX E
MPO Board (August 2019)

Name	Affiliation	Member/Alternate	Race	Gender
Damon Seils	Town Of Carrboro	Member – Chair	W	M
Wendy Jacobs	Durham County	Member – Vice Chair	W	F
Vernetta Alston	City of Durham	Member	BAA	F
Michael Parker	Town Of Chapel Hill	Member	W	M
Karen Howard	Chatham County	Member	BAA	F
Renee Price	Orange County	Member	BAA	F
Jenn Weaver	Town Of Hillsborough	Member	W	F
Ellen Reckhow	GoTriangle	Member	W	F
Charlie Reece	City Of Durham	Member	W	M
Nina Szlosberg-Landis	NC Board of Transportation	Member	W	F
James G. Crawford	Chatham County	Alternate	W	M
Lydia Lavelle	Town Of Carrboro	Alternate	W	F
Pam Hemminger	Town of Chapel Hill	Alternate	W	F
Penny Rich	Orange County	Alternate	W	F
Heidi Carter	Durham County	Alternate	W	F
Marc Marcoplos	GoTriangle	Alternate	W	M
Steve Schewel	City of Durham	Alternate	W	M
Mark Bell	Town Of Hillsborough	Alternate	W	M
Mike Fox	NC Board of Transportation	Alternate	W	M
John Sullivan	Federal Highway Administration	Non-Voting Member	W	M

- M – Male
- F - Female
- W – White
- BAA – Black or African American
- AIAN – American Indian or Alaska Native
- A – Asian
- NHPI – Native Hawaiian or Pacific Islander

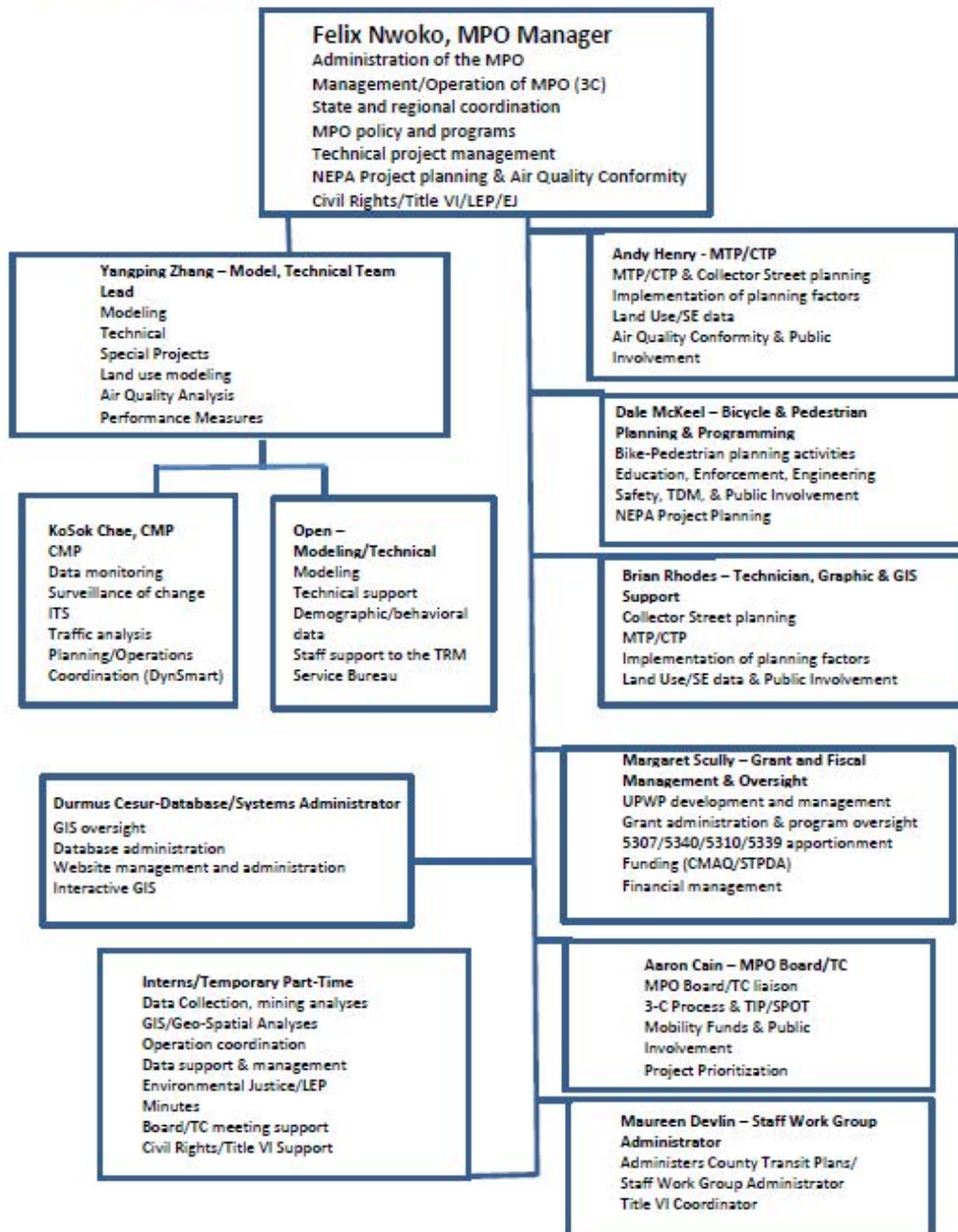
Technical Committee Members (August 2019)

Name	Affiliation	Race	Gender
Nishith Trivedi (Chair)	Orange County	A	M
Ellen Beckmann (Vice Chair)	City of Durham	W	F
Tina Moon	Carrboro Planning	W	F
Zachary Hallock	Carrboro Planning	W	M
Kumar Neppalli	Chapel Hill Engineering	A	M
Jomar Pastorelle	Chapel Hill Planning	A	M
Bergen Watterson	Chapel Hill Planning	W	F
Chance Mullis	Chatham County Planning	W	M
Evan Tenenbaum	City of Durham Transportation	W	M
Kayla Seibel	City of Durham Planning	W	F
Tasha Johnson	City of Durham Public Works	BAA	F
Pierre Osei-Owusu	Go Durham	BAA	M
Margaret Hauth	Hillsborough	W	F
Linda Thomas Wallace	Durham County	BAA	F
Scott Whiteman	Durham County Planning	W	M
Tom Altieri	Orange County Planning	W	M
Vacant	Durham County Planning	N/A	N/A
Theo Letman	Orange Public Transportation	BAA	M
John Hodges-Copple	TJCOG	W	M
Joey Hopkins	NCDOT Division 5	W	M
Mike Mills	NCDOT Division 7	W	M
Brandon Jones	NCDOT Division 8	W	M
Julie Bogle	NCDOT TPD	W	F
John Grant	NCDOT Traffic Operations	W	M
Patrick McDonough	GoTriangle	W	M
Scott Levitan	Research Triangle Foundation	W	M
Vacant	Duke University	N/A	N/A
Ernest Jenkins	North Carolina Central University	BAA	M
Kurt Stolka	The University of North Carolina	W	M
Michael Langduth	The Raleigh Durham Airport Authority	W	M
Vacant	NCDENR	N/A	N/A

- M – Male
- F - Female
- W – White
- BAA – Black or African American AIAN – American Indian or Alaska Native
- A – Asian
- NHPI – Native Hawaiian or Pacific Islander

APPENDIX F

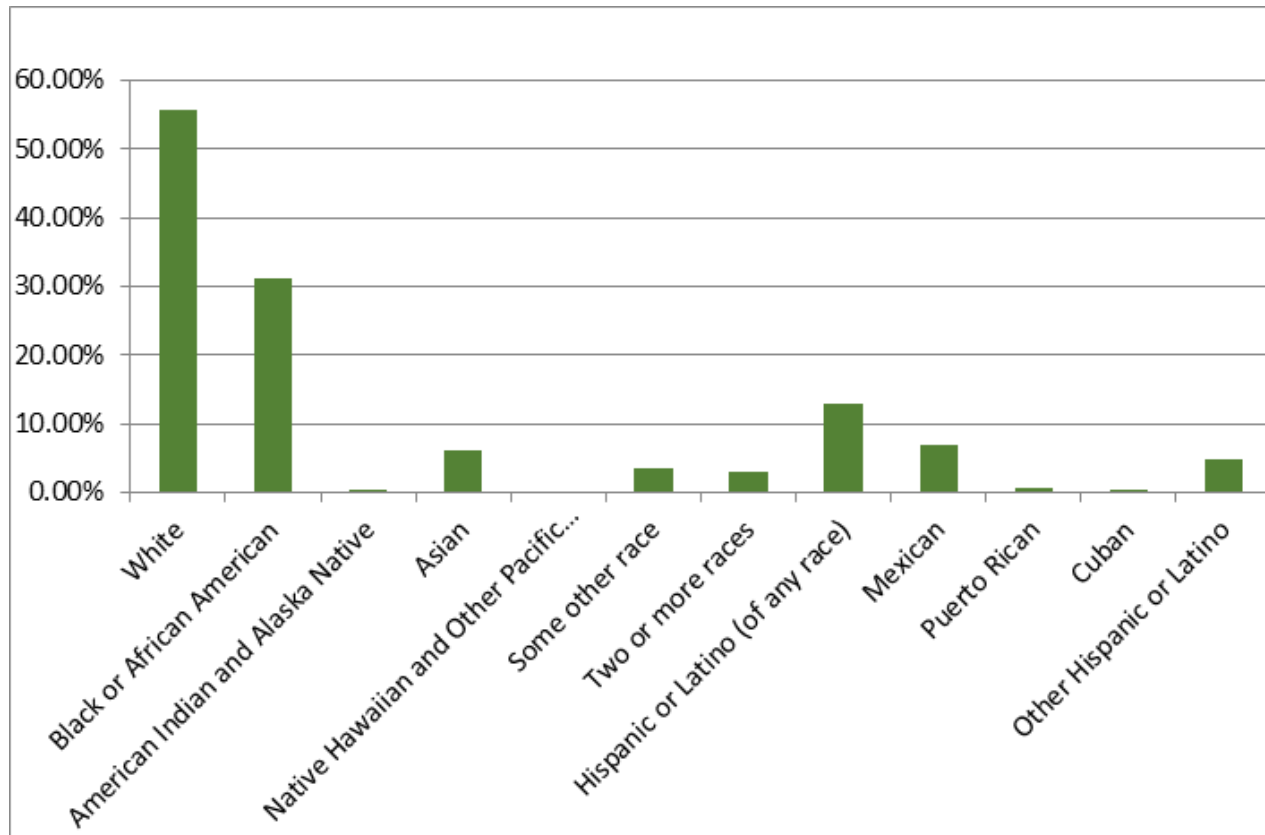
DCHC MPO LEAD PLANNING AGENCY (LPA)



APPENDIX G: Tables for Race/Ethnicity and Pover- **Demographic Tables**

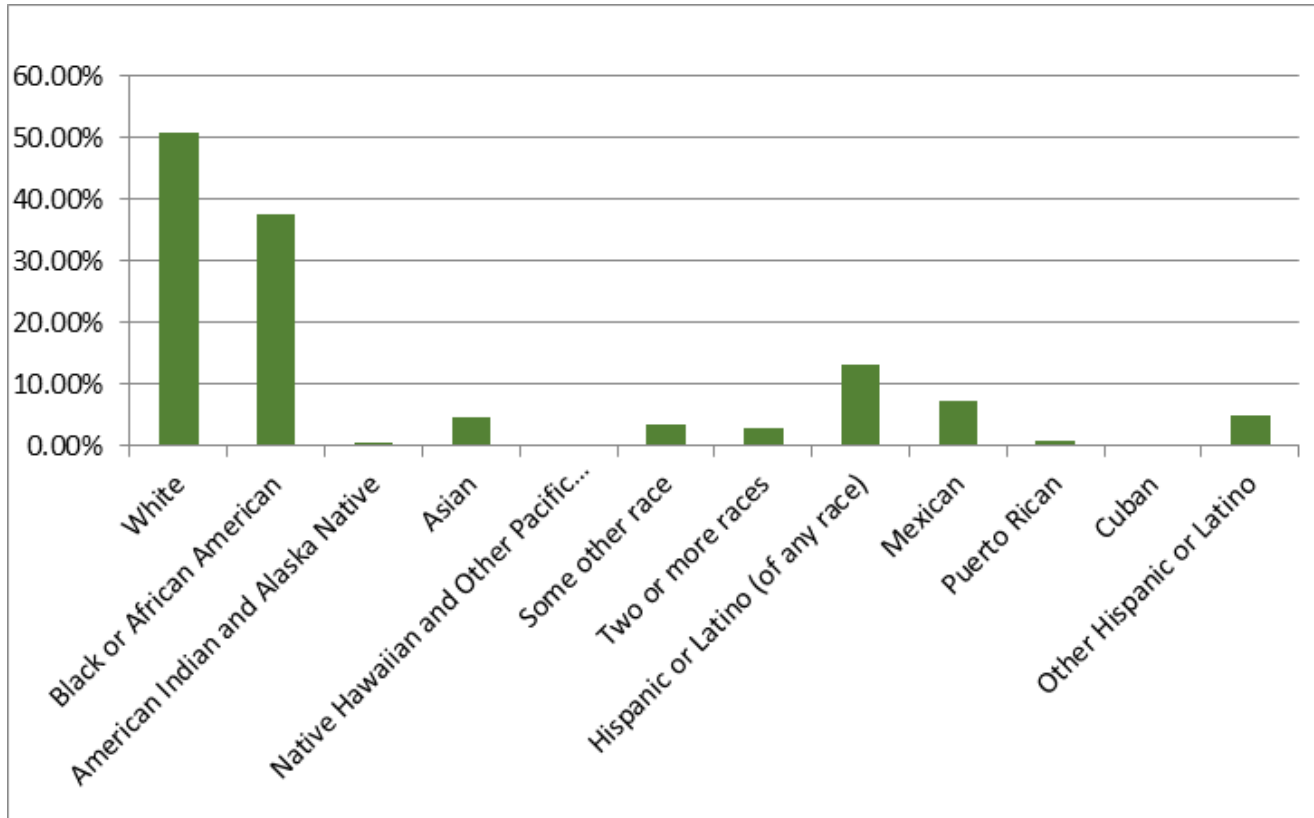
The following tables were completed using ACS 2016 5-year estimates.

Race and Ethnicity



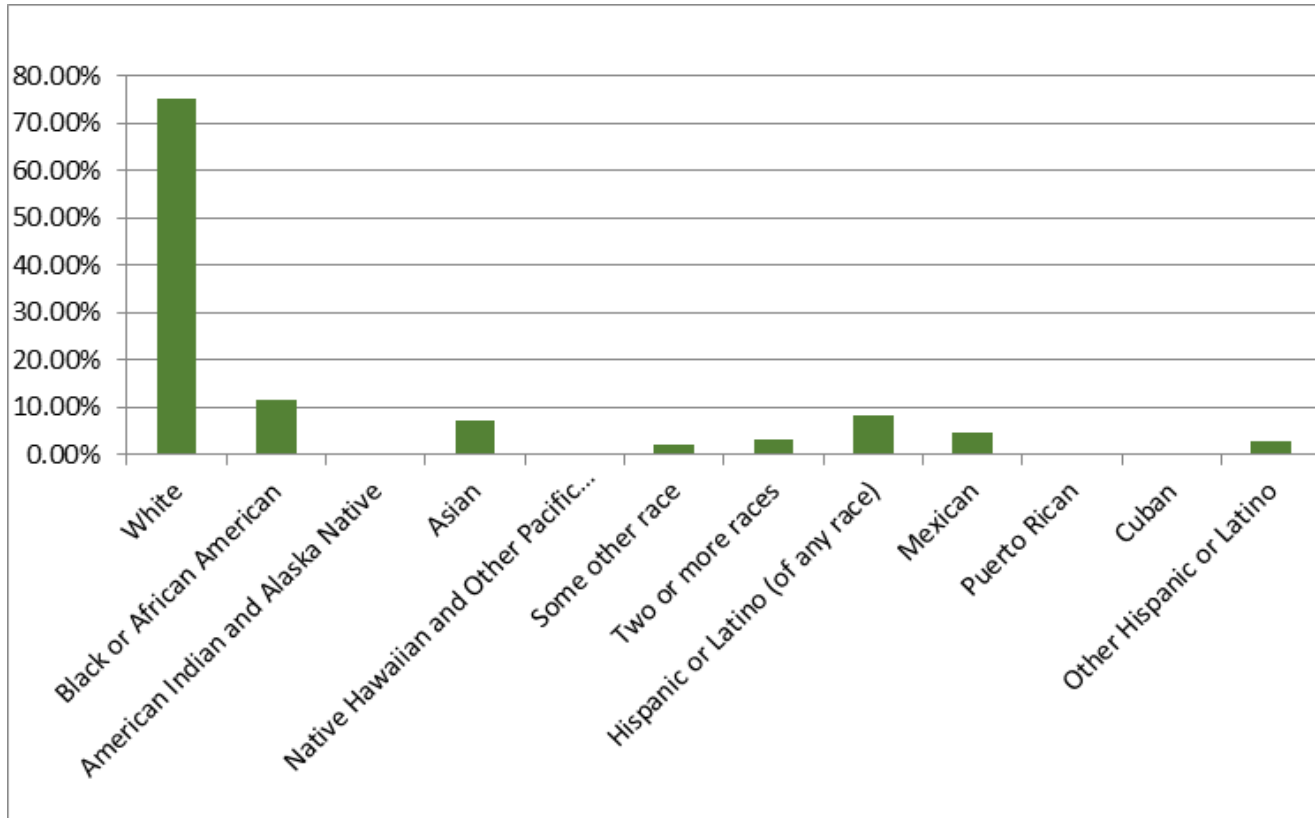
Race and Ethnicity	Number	Percent
Total Population	372,955	100.00%
White	207,898	55.70%
Black or African American	115,984	31.10%
American Indian or Alaska Native	1,499	0.40%
Asian	23,232	6.20%
Native Hawaiian and Other Pacific Islander	170	0.00%
Some other Race	13,038	3.50%
Two or More Races	11,134	3.00%
		12.80%
HISPANIC OR LATINO (of any race)	47,745	7.00%
Mexican	26,105	0.70%
Puerto Rican	2,730	0.30%
Cuban	1,065	4.80%
Other Hispanic or Latino	17,845	100.00%

Durham County Race and Ethnicity Table



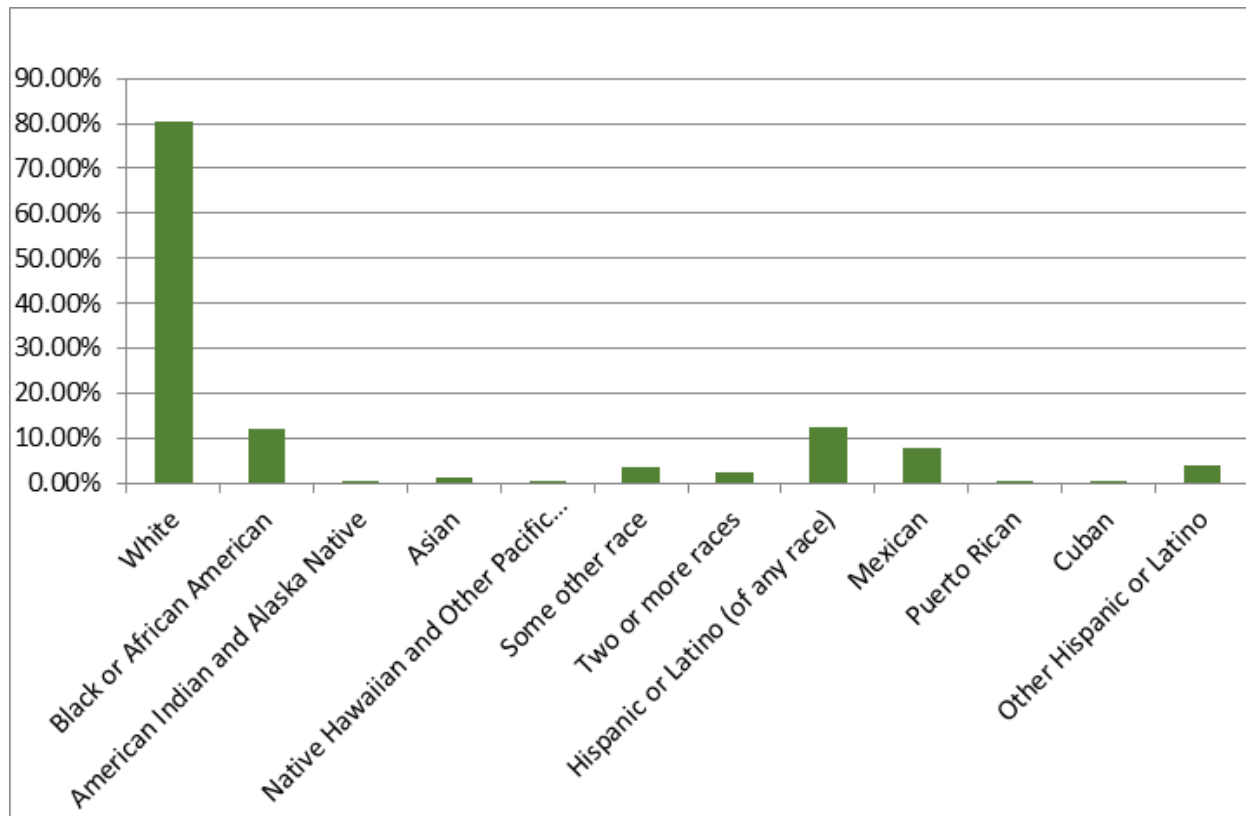
Race and Ethnicity	Number	Percent
Total Population	294,618	100.00%
White	150,067	50.90%
Black or African American	110,777	37.60%
American Indian or Alaska Native	1,091	0.40%
Asian	13,849	4.70%
Native Hawaiian and Other Pacific Islander	125	0.00%
Some other Race	10,377	3.50%
Two or More Races	8,332	2.80%
HISPANIC OR LATINO (of any race)	39,257	13.30%
Mexican	21,424	7.30%
Puerto Rican	2,397	0.80%
Cuban	908	0.30%
Other Hispanic or Latino	14,528	4.90%

Orange County Race and Ethnicity Table



Race and Ethnicity	Number	Percent
Total Population	139,807	100.00%
White	105,093	75.20%
Black or African American	16,010	11.50%
American Indian or Alaska Native	709	0.50%
Asian	10,261	7.30%
Native Hawaiian and Other Pacific Islander	30	0.00%
Some other Race	3,067	2.20%
Two or More Races	4,637	3.30%
HISPANIC OR LATINO (of any race)	11,545	8.30%
Mexican	6,503	4.70%
Puerto Rican	643	0.50%
Cuban	270	0.20%
Other Hispanic or Latino	4,129	3.00%

Chatham County Race and Ethnicity Table

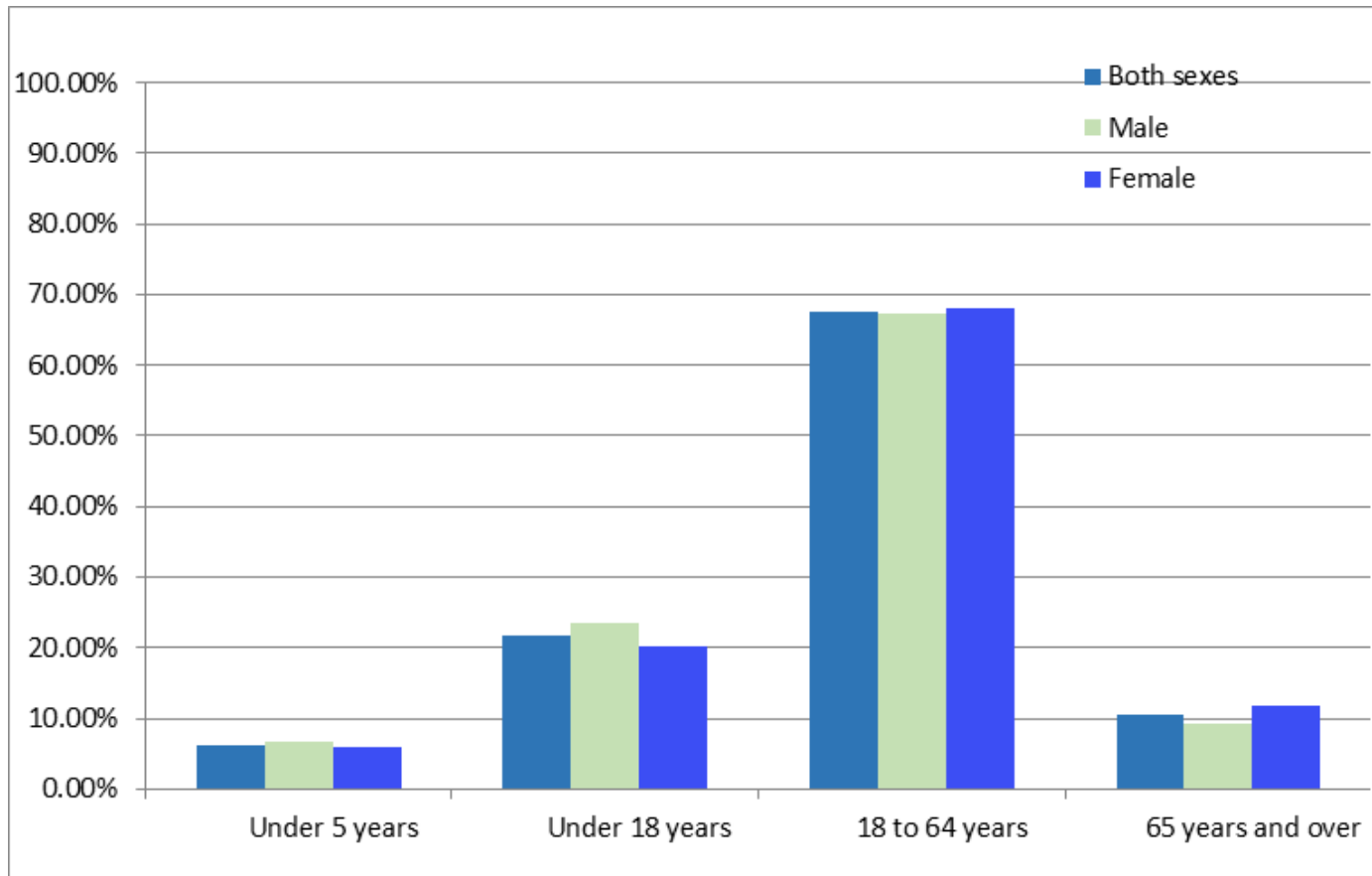


Race and Ethnicity	Number	Percent
Total Population	68,778	100.00%
White	55,295	0.80
Black or African American	8,218	0.12
American Indian or Alaska Native	185	0.00
Asian	975	0.01
Native Hawaiian and Other Pacific Islander	43	0.00
Some other Race	2,317	0.03
Two or More Races	1,745	0.03
HISPANIC OR LATINO (of any race)	8,500	0.12
Mexican	5,422	0.08
Puerto Rican	435	0.01
Cuban	57	0.00
Other Hispanic or Latino	2,586	0.04

Age and Sex

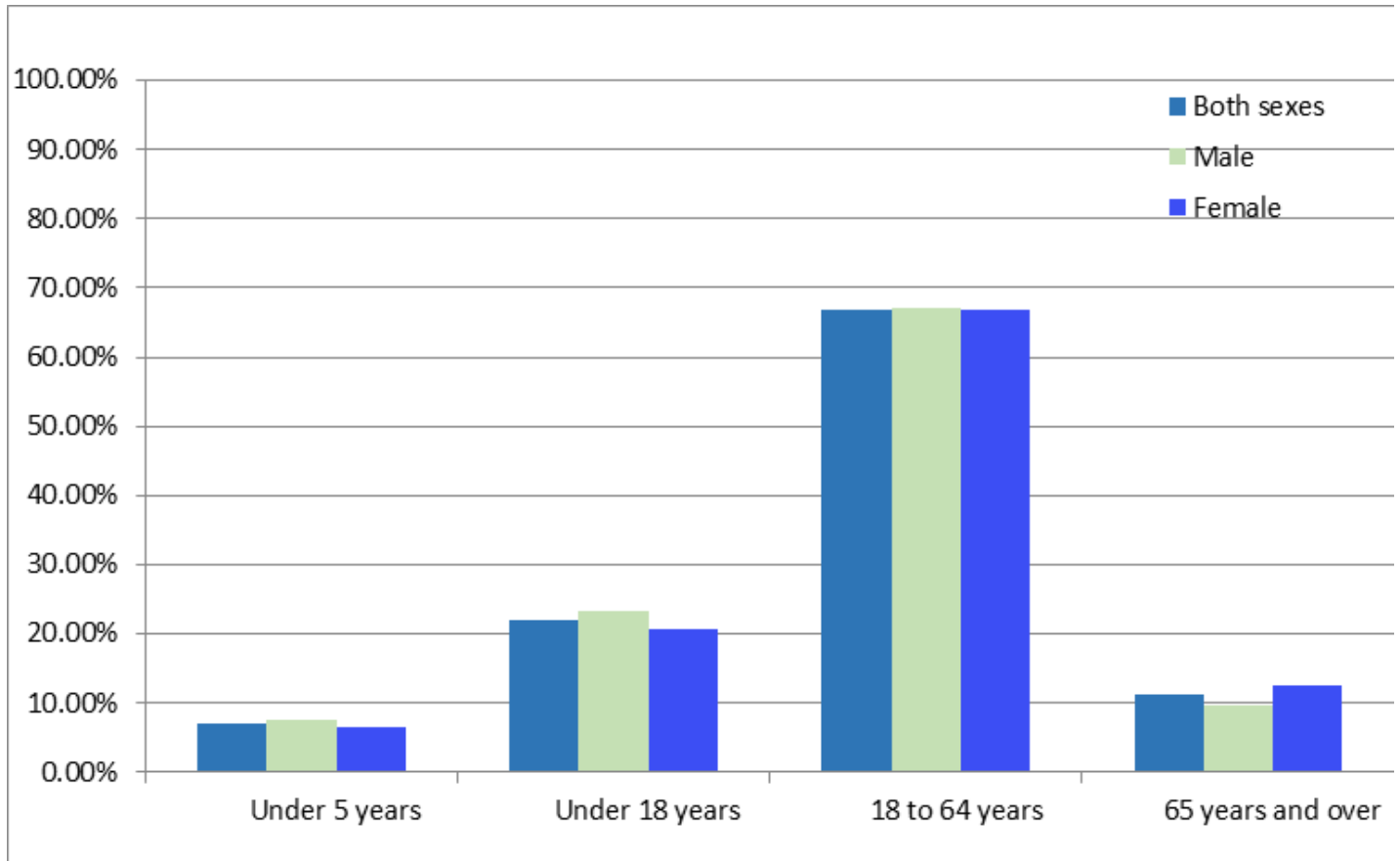
The following table was completed using data from ACS 2016 5-year estimates.

DCHC MPO (Durham Urbanized Area) Age and Sex



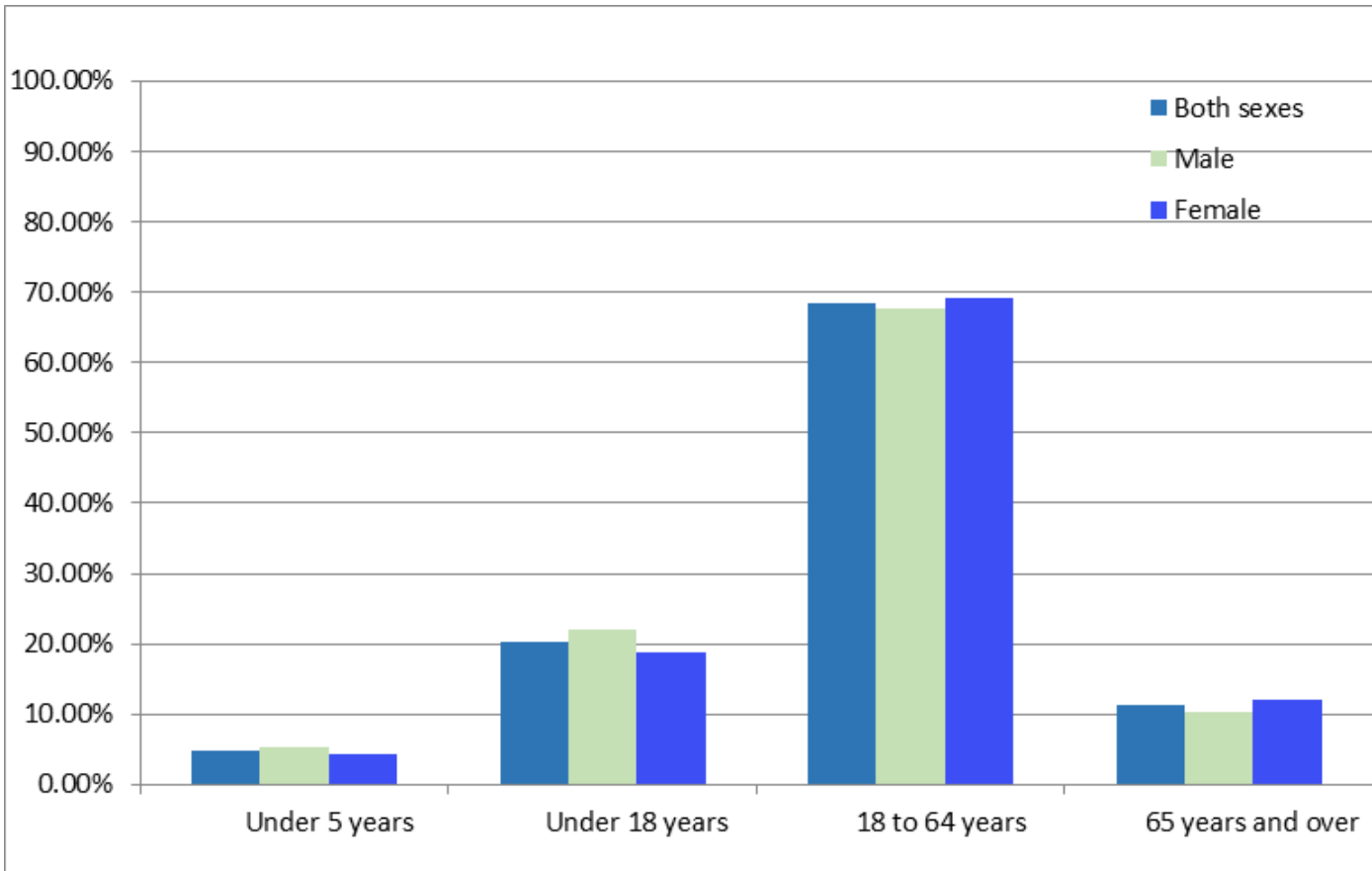
Age	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	372,955	175,301	197,654	100.00%	100.00%	100.00%
Under 5 years	23,499	11,972	11,527	6.30%	6.83%	5.83%
Under 18 years	81,006	41,079	39,927	21.72%	23.43%	20.20%
18 to 64 years	252,445	118,124	134,321	67.69%	67.38%	67.96%
65 years and over	39,504	16,098	23,406	10.59%	9.18%	11.84%
Median Age	32.9	32.1	33.8			

Durham County Age and Sex



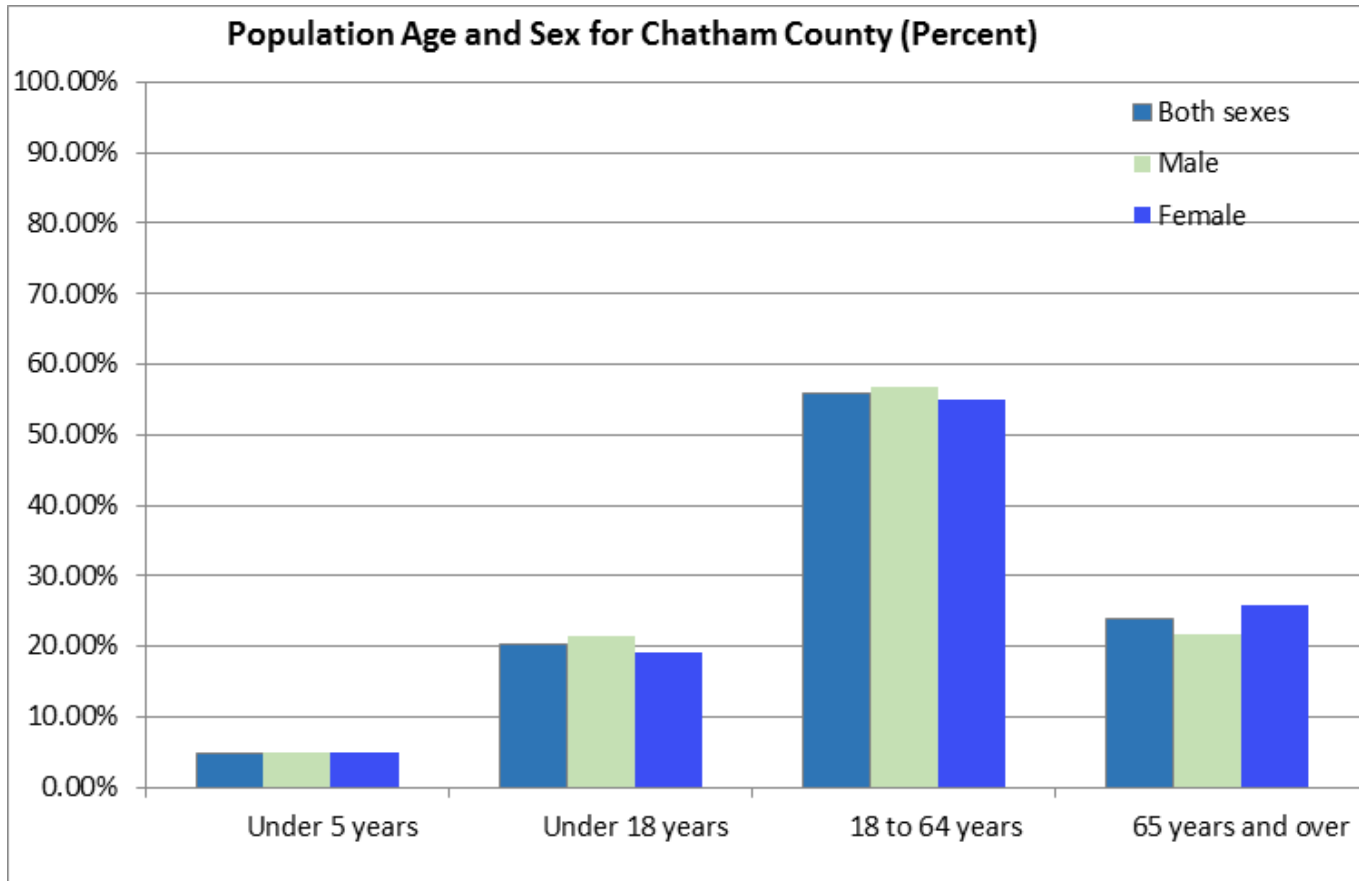
Age	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	294,618	140,813	153,805	100.00%	100.00%	100.00%
Under 5 years	20,501	10,535	9,966	6.96%	7.48%	6.48%
Under 18 years	64,587	32,919	31,668	21.92%	23.38%	20.59%
18 to 64 years	197,266	94,308	102,958	66.96%	66.97%	66.94%
65 years and over	32,765	13,586	19,179	11.12%	9.65%	12.47%
Median Age	34.6	33.7	35.6			

Orange County Age and Sex



Age	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	139,807	66,666	73,141	100.00%	100.00%	100.00%
Under 5 years	6,670	3,472	3,198	4.77%	5.21%	4.37%
Under 18 years	28,505	14,747	13,758	20.39%	22.12%	18.81%
18 to 64 years	95,608	45,062	50,546	68.39%	67.59%	69.11%
65 years and over	15,694	6,857	8,837	11.23%	10.29%	12.08%
Median Age	33.6	32.9	34.3			

Chatham County Age and Sex

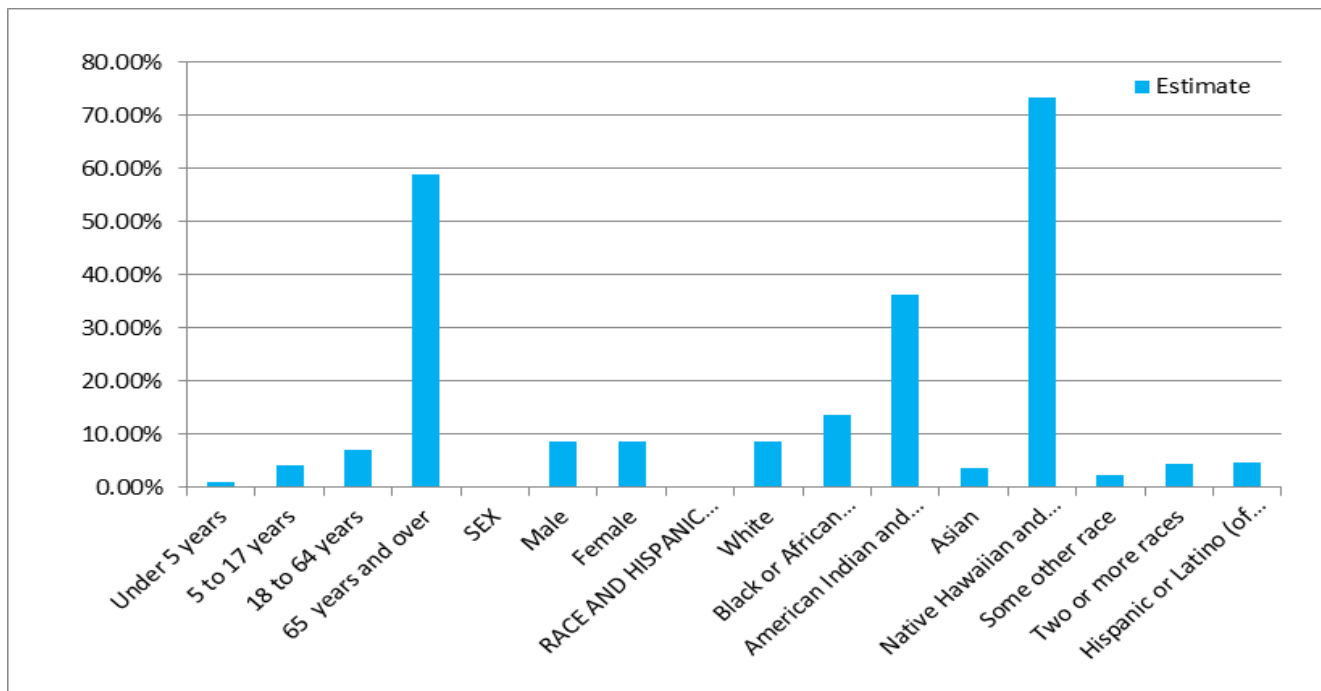


Age	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	68,778	33,303	35,475	100.00%	100.00%	100.00%
Under 5 years	3,364	1,639	1,725	4.89%	4.92%	4.86%
Under 18 years	13,946	7,145	6,801	20.28%	21.45%	19.17%
18 to 64 years	38,442	18,918	19,524	55.89%	56.81%	55.04%
65 years and over	16,390	7,240	9,150	23.83%	21.74%	25.79%
Median Age	46.9	45.1	48.8			

Disability

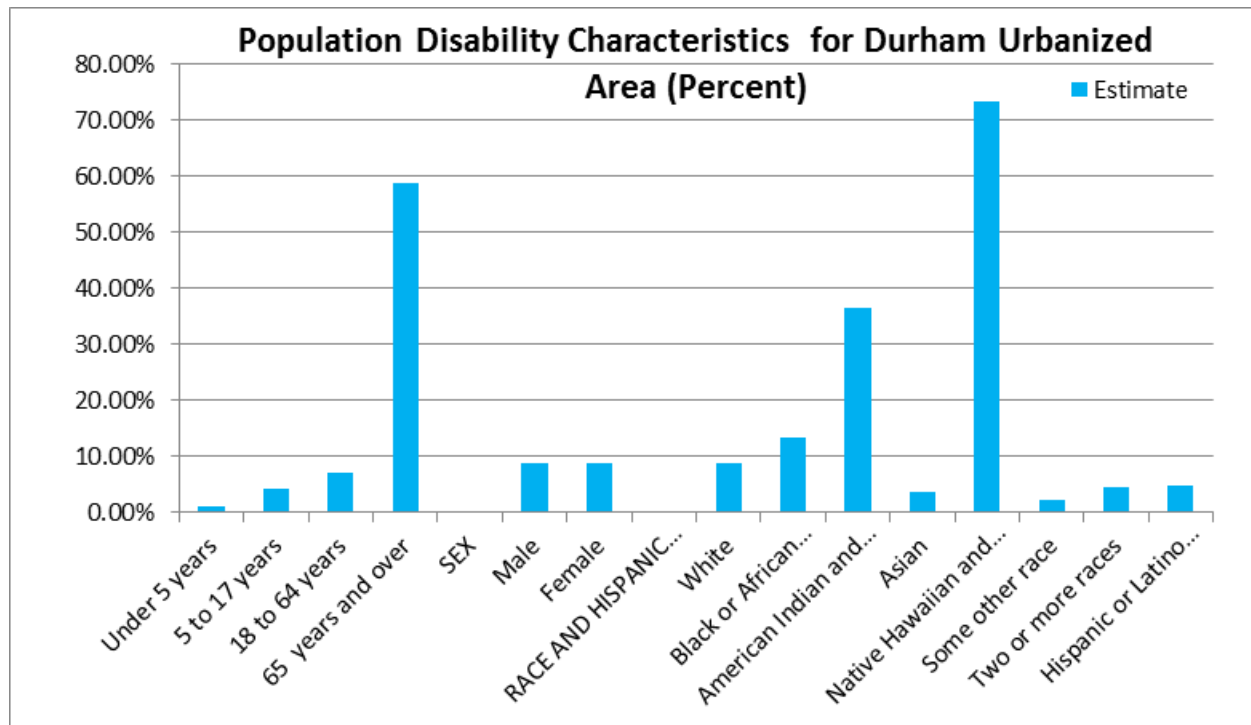
The following tables were completed using ACS 2016 5-year estimates

DCHC MPO (Durham Urbanized Area) Disability



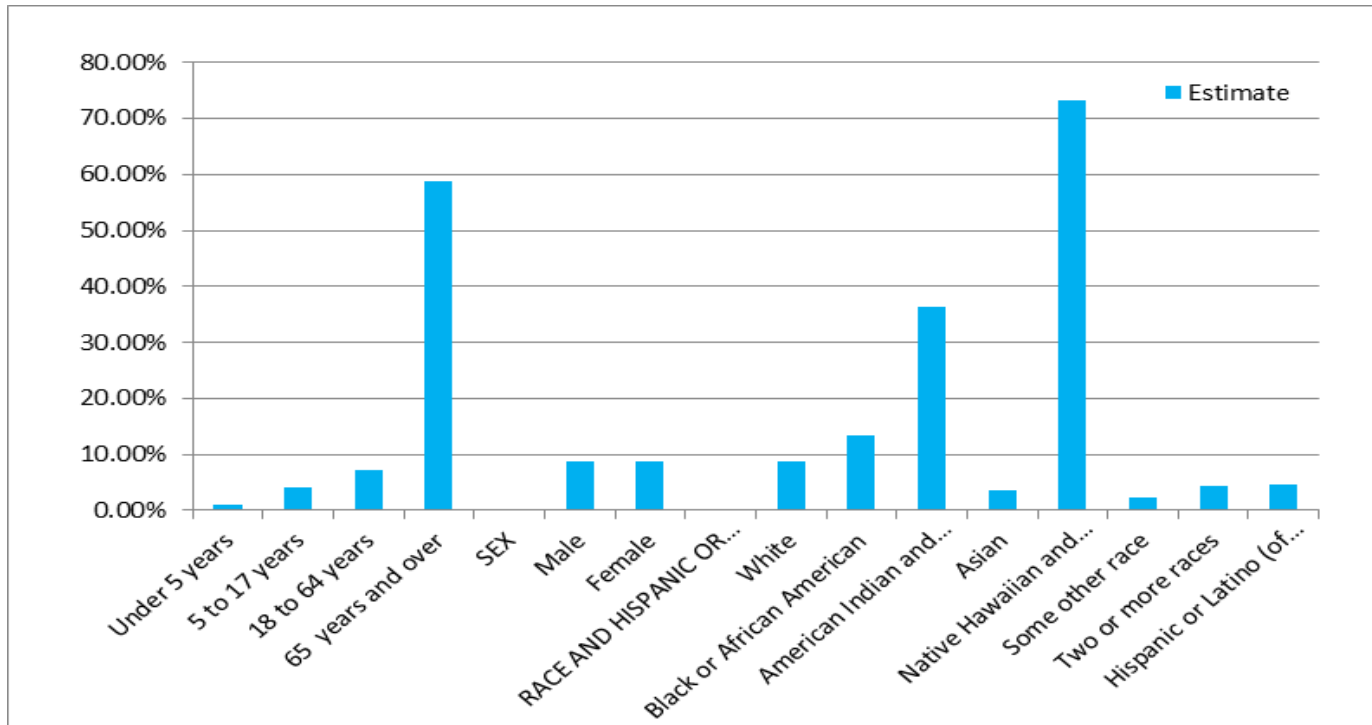
Subject	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total civilian noninstitutionalized population	369,917	+/-1,669	34,056	+/-1,411	9.20%	+/-0.4
Population under 5 years	23,494	+/-518	251	+/-131	1.10%	+/-0.6
Population 5 to 17 years	57,394	+/-618	2,322	+/-388	4.00%	+/-0.7
Population 18 to 64 years	250,927	+/-1190	19,112	+/-926	7.62%	+/-0.3
Population 65 years and over	38,102	+/-678	9,123	+/-699	23.94%	+/-1.6
SEX						
Male	173,515	+/-1,115	14,776	+/-896	8.50%	+/-0.5
Female	196,402	+/-968	19,280	+/-1,014	9.80%	+/-0.5
RACE AND HISPANIC OR LATINO ORIGIN						
White	206,487	+/-2,117	17,518	+/-1,010	8.50%	+/-0.5
Black or African American	114,494	+/-1,205	14,119	+/-984	12.30%	+/-0.9
American Indian and Alaska Native	1,480	+/-297	378	+/-124	25.50%	+/-8.2
Asian	23,206	+/-601	727	+/-203	3.10%	+/-0.9
Native American and Other Pacific Islander	170	+/-54	22	+/-27	12.90%	+/-14.6
Some other Race	13,021	+/-1,513	582	+/-245	4.50%	+/-1.8
Two or more races	11,059	+/-1,127	710	+/-197	6.40%	+/-1.7
Hispanic or Latino	47,578	+/-706	2,001	+/-372	4.20%	+/-0.8

Durham County Disability



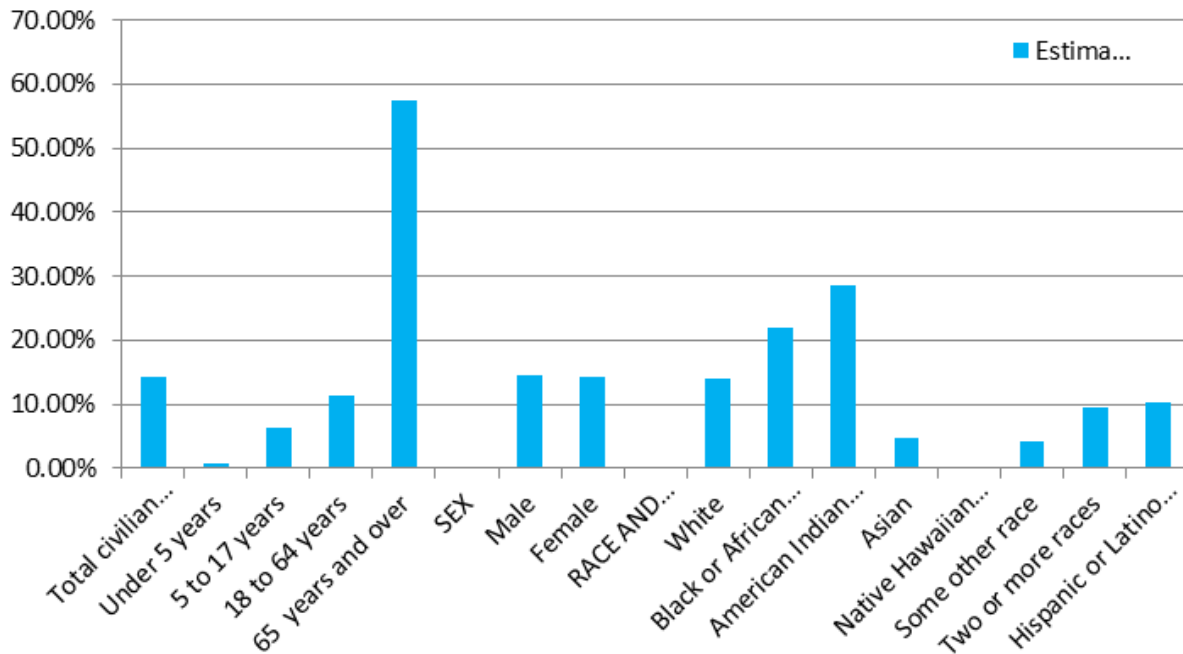
Subject	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total civilian noninstitutionalized population	289,003	+/-515	28,725	+/-1,342	9.90%	+/-0.5
Population under 5 years	20,495	+/-51	183	+/-123	0.90%	+/-0.6
Population 5 to 17 years	43,975	+/-77	1,831	+/-329	4.20%	+/-0.7
Population 18 to 64 years	193,144	+/-391	15,941	+/-895	8.25%	+/-0.5
Population 65 years and over	31,389	+/-340	9,123	+/-617	29.06%	+/-1.9
SEX						
Male	136,235	+/-381	12,689	+/-776	9.30%	+/-0.6
Female	152,768	+/-262	16,036	+/-967	10.50%	+/-0.6
RACE AND HISPANIC OR LATINO ORIGIN						
White	147,898	+/-1,547	13,717	+/-833	9.30%	+/-0.6
Black or African American	107,807	+/-909	13,220	+/-965	12.30%	+/-0.9
American Indian and Alaska Native	989	+/-297	165	+/-95	16.70%	+/-9.3
Asian	13,823	+/-358	391	+/-145	2.80%	+/-1.0
Native American and Other Pacific Islander	125	+/-37	0	+/-28	0.00%	+/-22.6
Some other Race	10,268	+/-1,458	537	+/-239	5.20%	+/-2.2
Two or more races	8,093	+/-1,034	695	+/-197	8.60%	+/-2.3
Hispanic or Latino	38,678	+/-151	1,611	+/-322	4.20%	+/-0.8

Orange County Disability



Subject	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total civilian noninstitutionalized population	139,108	+/-194	12,130	+/-850	8.70%	+/-0.6
Population under 5 years	6,670	+/-40	68	+/-48	1.00%	+/-0.7
Population 5 to 17 years	21,827	+/-41	886	+/-221	4.10%	+/-1.0
Population 18 to 64 years	95,112	+/-191	6,751	+/-631	7.10%	+/-0.7
Population 65 years and over	15,499	+/-200	9,123	+/-348	58.86%	+/-2
SEX						
Male	66,173	+/-186	5,778	+/-577	8.70%	+/-0.9
Female	72,935	+/-117	6,352	+/-507	8.70%	+/-0.7
RACE AND HISPANIC OR LATINO ORIGIN						
White	104,760	+/-666	9,104	+/-689	8.70%	+/-0.7
Black or African American	15,689	+/-484	2,118	+/-451	13.50%	+/-2.9
American Indian and Alaska Native	696	+/-130	253	+/-86	36.40%	+/-11.9
Asian	10,261	+/-298	359	+/-145	3.50%	+/-1.4
Native American and Other Pacific Islander	30	+/-29	22	+/-27	73.30%	+/-31.7
Some other Race	3,054	+/-610	71	+/-61	2.30%	+/-2.0
Two or more races	4,618	+/-527	203	+/-92	4.40%	+/-1.9
Hispanic or Latino	11,511	+/-44	538	+/-159	4.70%	+/-1.4

Chatham County Disability

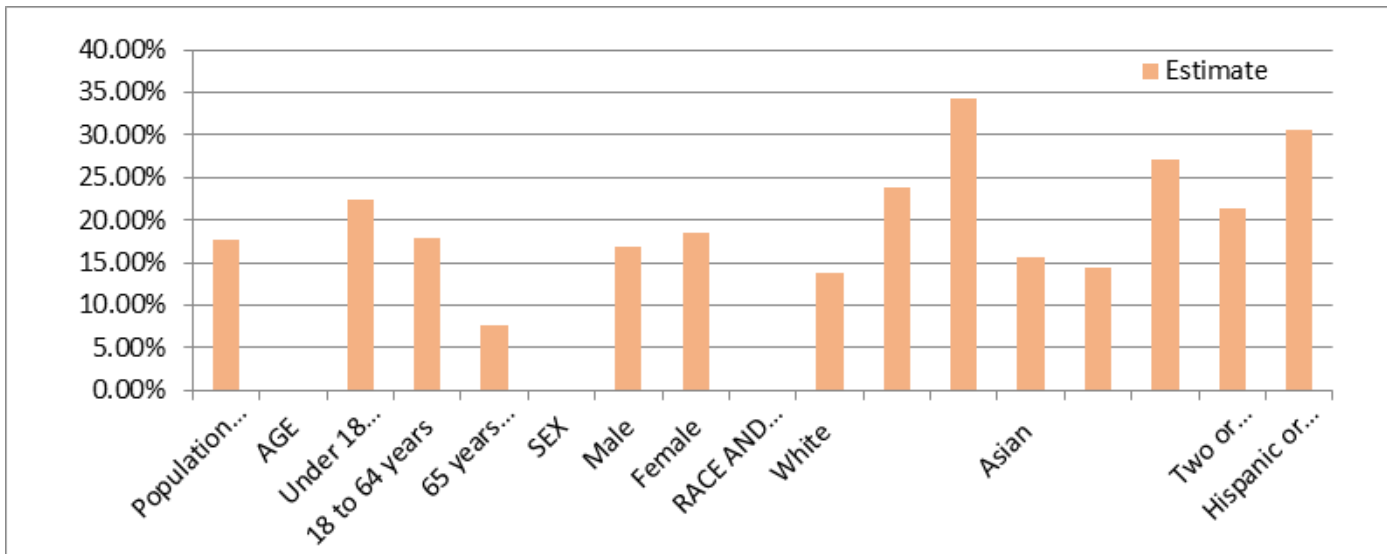


Subject	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total civilian noninstitutionalized population	68,048	+/-176	9,764	+/-819	14.30%	68,048
Population under 5 years	3,364	+/-40	26	+/-40	0.80%	3,364
Population 5 to 17 years	10,560	+/-82	655	+/-187	6.20%	10,560
Population 18 to 64 years	38,216	+/-299	4,295	+/-554	11.24%	38,216
Population 65 years and over	15,908	+/-280	9,123	+/-431	57.35%	15,908
SEX						
Male	32,924	+/-248	4,787	+/-500	14.50%	32,924
Female	35,124	+/-242	4,977	+/-483	14.20%	35,124
RACE AND HISPANIC OR LATINO ORIGIN						
White	54,809	+/-696	7,655	+/-747	14.00%	54,809
Black or African American	7,981	+/-381	1,750	+/-254	21.90%	7,981
American Indian and Alaska Native	185	+/-111	53	+/-60	28.60%	185
Asian	975	+/-128	45	+/-44	4.60%	975
Native American and Other Pacific Islander	43	+/-46	0	+/-28	0.00%	43
Some other Race	2,317	+/-690	94	+/-75	4.10%	2,317
Two or more races	1,738	+/-332	167	+/-102	9.60%	1,738
Hispanic or Latino	8,485	+/-18	877	+/-302	10.30%	8,485

Poverty

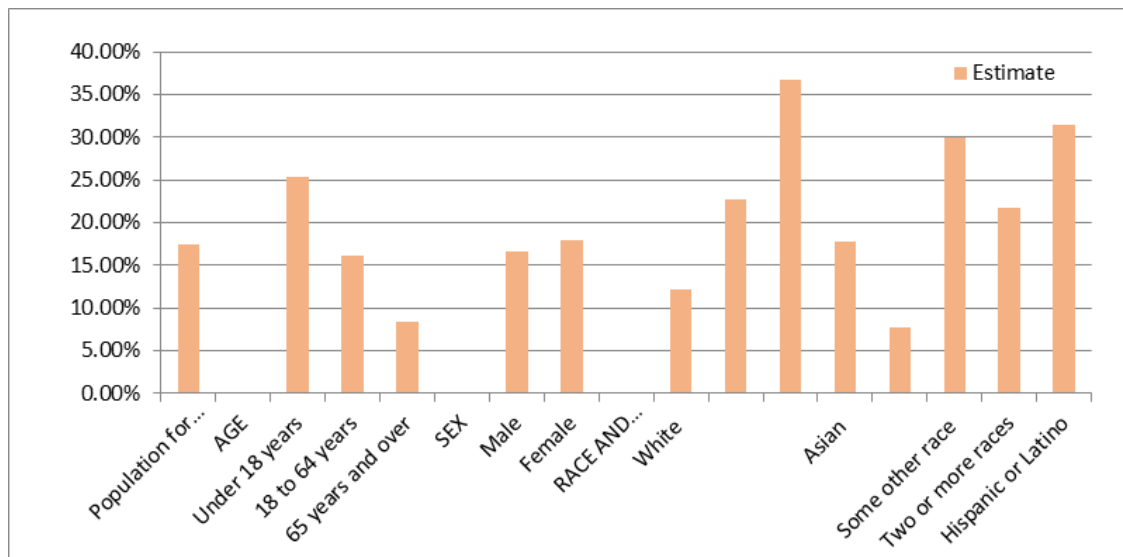
The following tables were completed using ACS 2016 5-year estimates:

DCHC MPO (Durham Urbanized Area) Poverty



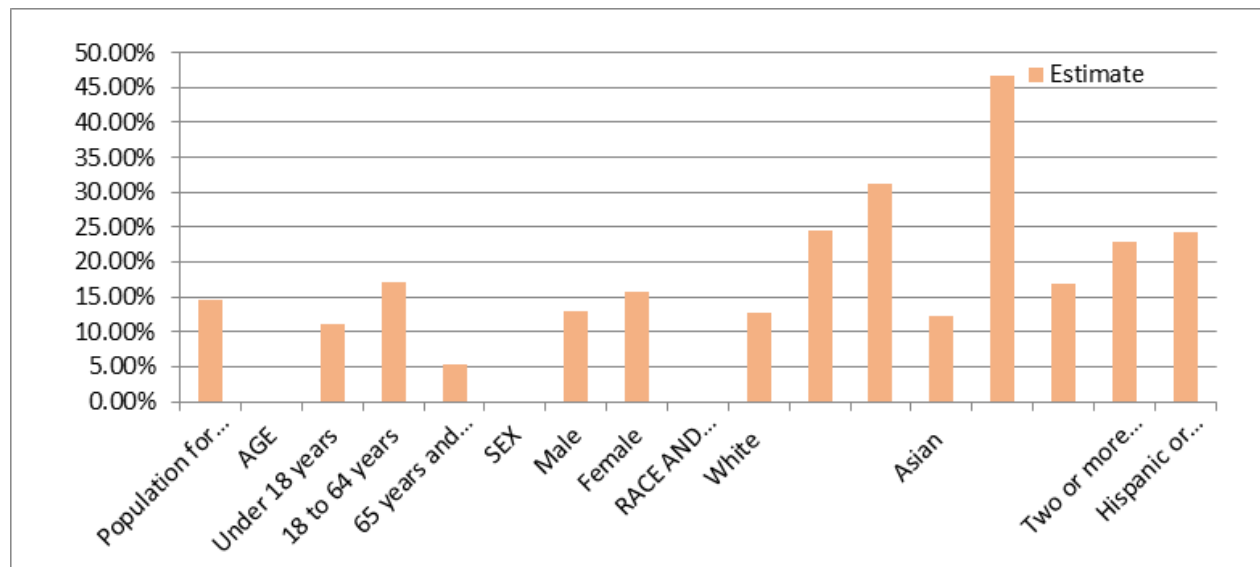
Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	353,022	+/-1,837	62,589	+/-2,417	17.70%	+/-0.7
AGE						
Under 18	79,809	+/-806	17,820	+/-1,310	22.30%	+/-1.6
18 to 64	235,111	+/-1,354	41,820	+/-1,532	17.80%	+/-0.6
65 years and over	38,102	+/-604	2,949	+/-375	7.70%	+/-1.0
SEX						
Male	166,238	+/-1,142	27,998	+/-1,434	16.80%	+/-0.8
Female	186,784	+/-1,012	34,591	+/-1,507	18.50%	+/-0.8
RACE AND HISPANIC OR LATINO ORIGIN						
White	196,968	+/-2,226	26,900	+/-1,808	13.70%	+/-0.9
Black or African American	110,544	+/-1,219	26,304	+/-1,714	23.80%	+/-1.5
American Indian and Alaska Native	1,396	+/-306	477	+/-314	34.20%	+/-18.4
Asian	21,254	+/-704	3,333	+/-649	15.70%	+/-2.9
Native American and Other Pacific Islander	160	+/-53	23	+/-28	14.40%	+/-17.2
Some other Race	12,450	+/-1,498	3,371	+/-827	27.10%	+/-5.9
Two or more races	10,250	+/-1,145	2,181	+/-535	21.30%	+/-4.5
Hispanic or Latino	46,102	+/-710	14,060	+/-1,505	30.50%	+/-3.3
All individuals below:						
50 percent of poverty level	31,680	+/-2,038	(X)	(X)	(X)	(X)
125 percent of poverty level	78,888	+/-2,797	(X)	(X)	(X)	(X)
150 percent of poverty level	94,752	+/-2,624	(X)	(X)	(X)	(X)
185 percent of poverty level	114,807	+/-2,952	(X)	(X)	(X)	(X)
200 percent of poverty level	123,865	+/-3,051	(X)	(X)	(X)	(X)

Durham County Poverty Characteristics



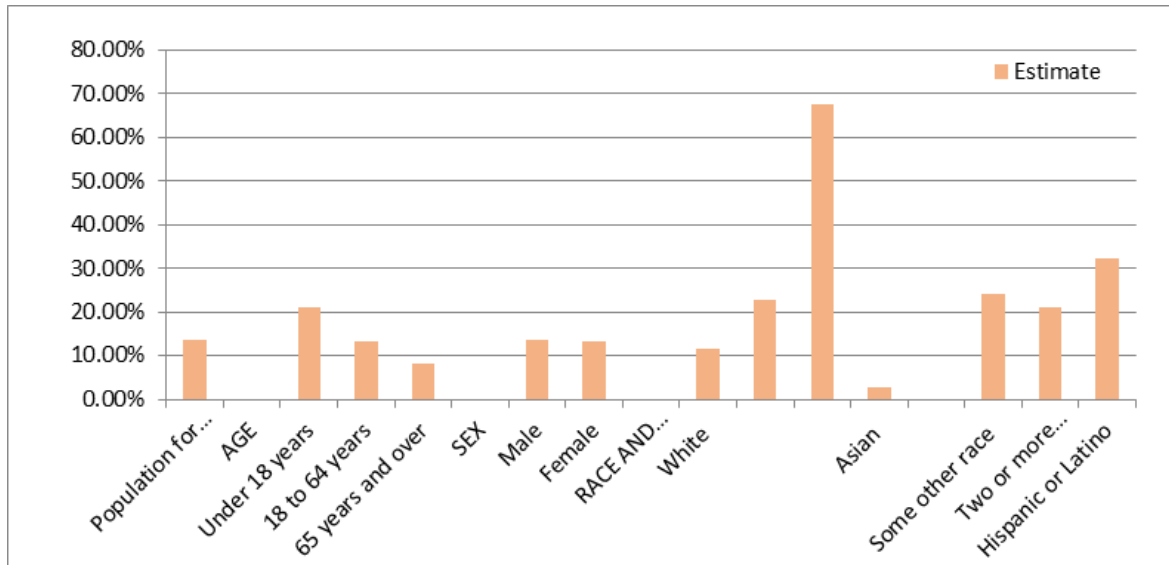
Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	281,786	+/-818	48,907	+/-2,188	17.40%	+/-0.8
AGE						
Under 18	63,677	+/-274	16,171	+/-1,213	25.40%	+/-1.9
18 to 64	186,720	+/-764	30,137	+/-1,326	16.10%	+/-0.7
65 years and over	31,389	+/-340	2,599	+/-364	8.30%	+/-1.2
SEX						
Male	133,220	+/-525	22,191	+/-1,283	16.70%	+/-1.0
Female	148,566	+/-465	26,716	+/-1,409	18.00%	+/-1.0
RACE AND HISPANIC OR LATINO ORIGIN						
White	145,348	+/-1,563	17,747	+/-1,587	12.20%	+/-1.1
Black or African American	104,887	+/-956	23,858	+/-1,707	22.70%	+/-1.6
American Indian and Alaska Native	971	+/-300	356	+/-280	36.70%	+/-21.6
Asian	12,698	+/-401	2,260	+/-488	17.80%	+/-3.6
Native American and Other Pacific Islander	115	+/-34	9	+/-13	7.80%	+/-13.1
Some other Race	9,896	+/-1,449	2,967	+/-832	30.00%	+/-6.9
Two or more races	7,871	+/-1,035	1,710	+/-508	21.70%	+/-5.1
Hispanic or Latino	37,953	+/-249	11,920	+/-1,475	31.40%	+/-3.9
All individuals below:						
50 percent of poverty level	23,622	+/-1,800	(X)	(X)	(X)	(X)
125 percent of poverty level	62,106	+/-2,440	(X)	(X)	(X)	(X)
150 percent of poverty level	75,597	+/-2,334	(X)	(X)	(X)	(X)
185 percent of poverty level	90,944	+/-2,517	(X)	(X)	(X)	(X)
200 percent of poverty level	97,605	+/-2,483	(X)	(X)	(X)	(X)

Orange County Poverty Characteristics



Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	129,358	+/-784	18,713	+/-1,382	14.50%	+/-1.0
AGE						
Under 18	28,097	+/-238	3,112	+/-567	11.10%	+/-2.0
18 to 64	85,762	+/-760	14,766	+/-1,008	17.20%	+/-1.1
65 years and over	15,499	+/-86	835	+/-189	5.40%	+/-1.2
SEX						
Male	61,873	+/-572	8,072	+/-925	13.00%	+/-1.5
Female	67,485	+/-544	10,641	+/-734	15.80%	+/-1.1
RACE AND HISPANIC OR LATINO ORIGIN						
White	97,749	+/-1,007	12,372	+/-994	12.70%	+/-1.0
Black or African American	14,649	+/-607	3,570	+/-689	24.40%	+/-4.4
American Indian and Alaska Native	630	+/-133	197	+/-135	31.30%	+/-18.5
Asian	9,434	+/-343	1,156	+/-376	12.30%	+/-3.9
Native American and Other Pacific Islander	30	+/-29	14	+/-24	46.70%	+/-52.0
Some other Race	2,855	+/-587	480	+/-291	16.80%	+/-9.6
Two or more races	4,011	+/-511	924	+/-263	23.00%	+/-6.5
Hispanic or Latino	10,759	+/-204	2,618	+/-628	24.30%	+/-5.8
All individuals below:						
50 percent of poverty level	10,028	+/-844	(X)	(X)	(X)	(X)
125 percent of poverty level	23,156	+/-1,432	(X)	(X)	(X)	(X)
150 percent of poverty level	27,711	+/-1,644	(X)	(X)	(X)	(X)
185 percent of poverty level	35,285	+/-1,952	(X)	(X)	(X)	(X)
200 percent of poverty level	38,867	+/-1,925	(X)	(X)	(X)	(X)

Chatham County Poverty Characteristics

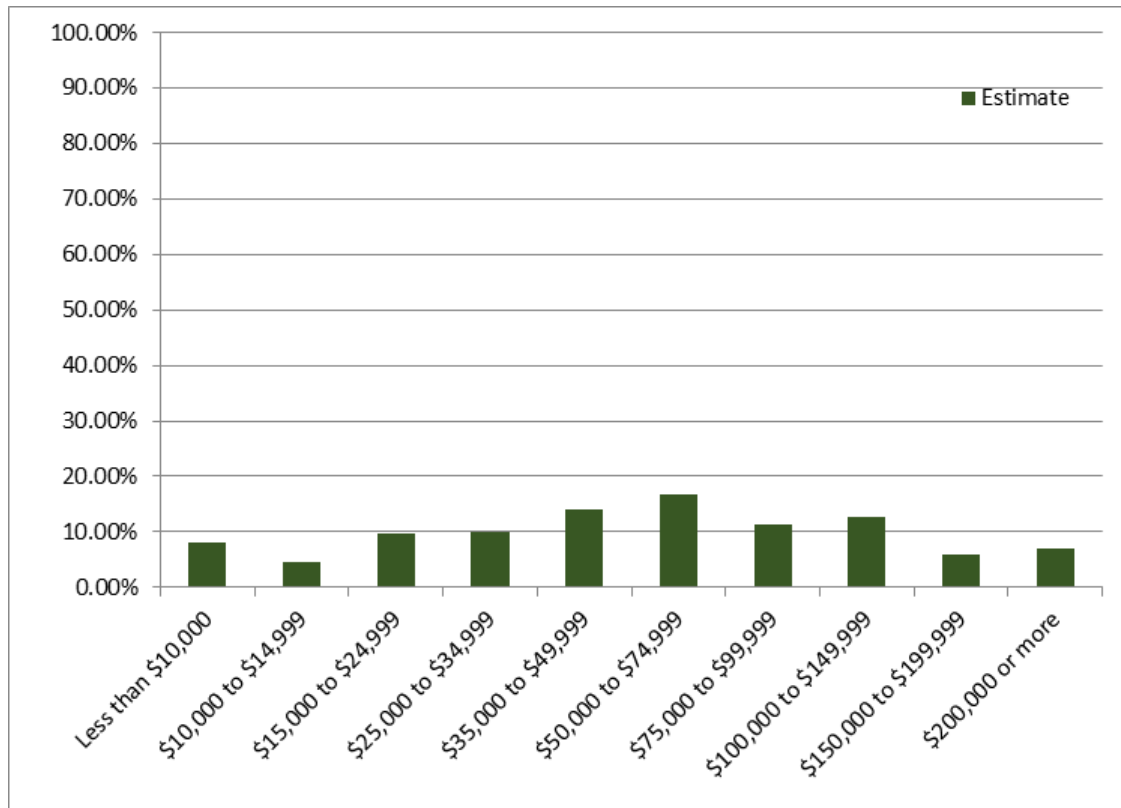


Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	67,758	+/-216	9,185	+/-912	13.60%	+/-1.3
AGE						
Under 18	13,628	+/-165	2,858	+/-481	21.00%	+/-3.5
18 to 64	38,222	+/-236	5,058	+/-548	13.20%	+/-1.4
65 years and over	15,908	+/-252	1,269	+/-250	8.00%	+/-1.5
SEX						
Male	32,770	+/-244	4,484	+/-502	13.70%	+/-1.5
Female	34,988	+/-256	4,701	+/-624	13.40%	+/-1.8
RACE AND HISPANIC OR LATINO ORIGIN						
White	54,674	+/-689	6,341	+/-870	11.60%	+/-1.6
Black or African American	7,922	+/-373	1,791	+/-376	22.60%	+/-4.7
American Indian and Alaska Native	185	+/-111	125	+/-114	67.60%	+/-31.4
Asian	975	+/-128	26	+/-40	2.70%	+/-4.2
Native American and Other Pacific Islander	43	+/-46	0	+/-28	0.00%	+/-45.2
Some other Race	2,290	+/-682	552	+/-409	24.10%	+/-15.4
Two or more races	1,669	+/-323	350	+/-169	21.00%	+/-9.6
Hispanic or Latino	8,487	+/-21	2,736	+/-551	32.20%	+/-6.5
All individuals below:						
50 percent of poverty level	3,669	+/-737	(X)	(X)	(X)	(X)
125 percent of poverty level	11,952	+/-1,033	(X)	(X)	(X)	(X)
150 percent of poverty level	15,041	+/-1,044	(X)	(X)	(X)	(X)
185 percent of poverty level	19,808	+/-1,207	(X)	(X)	(X)	(X)
200 percent of poverty level	21,052	+/-1,288	(X)	(X)	(X)	(X)

Household Income

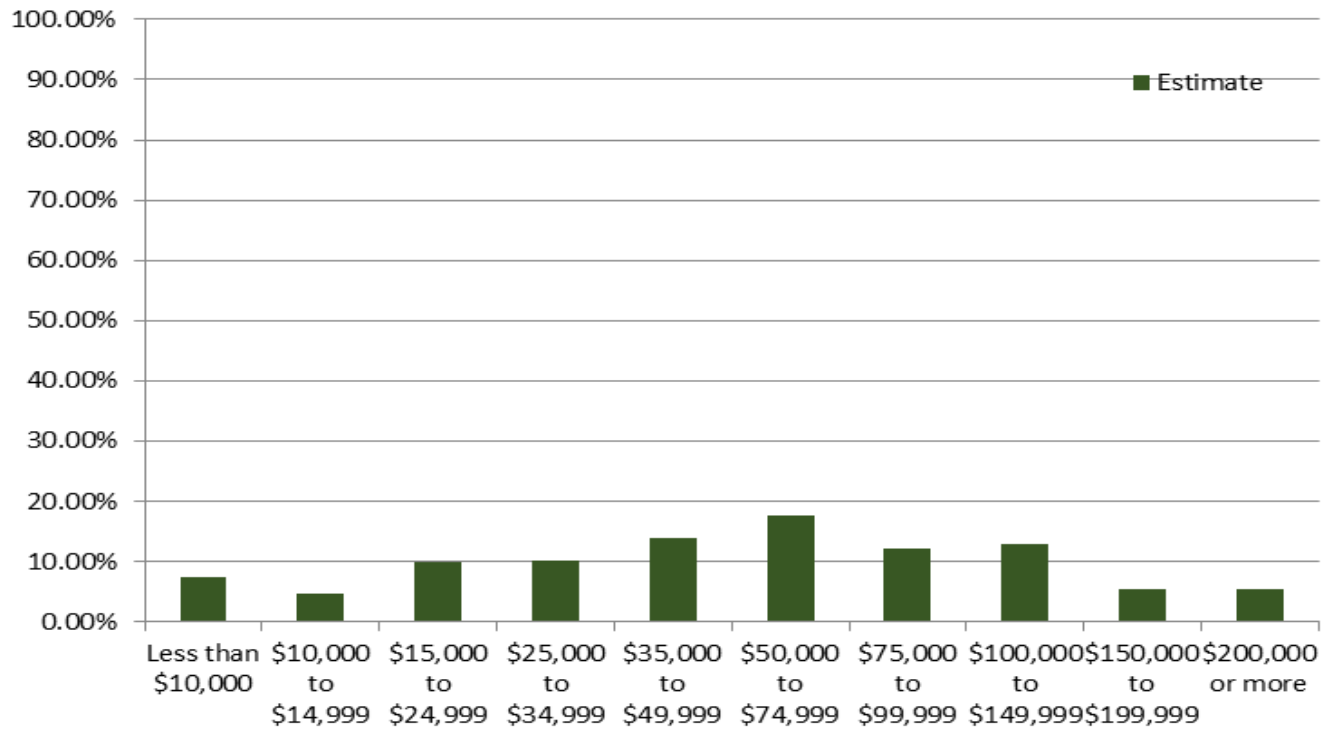
The following tables were completed using ACS 2016 5-year estimates:

DCHC MPO (Durham Urbanized Area) Household Income



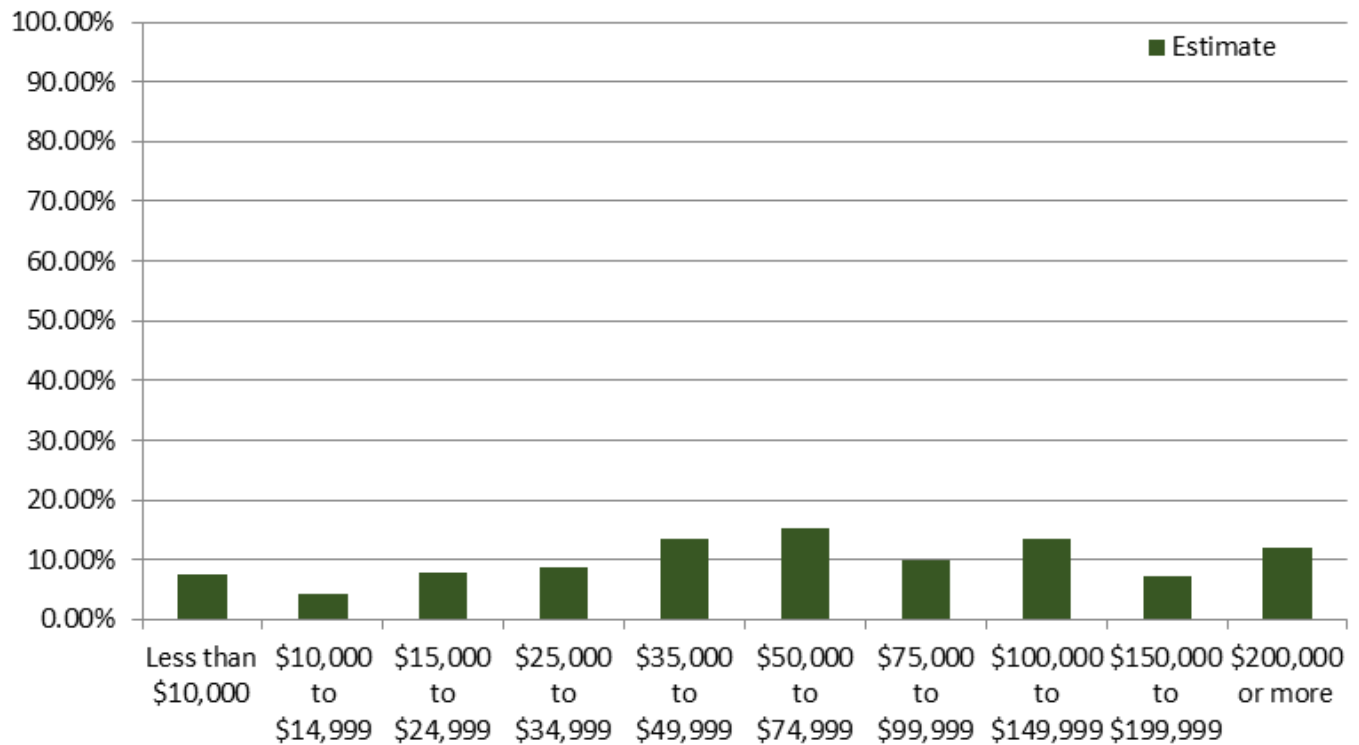
Subject	Households	
	Estimate	Margin of Error +/-
Total	147,229	+/-1,246
Less than \$10,000	11,778	+/-0.5
\$10,000 to \$14,999	6,773	+/-0.4
\$15,000 to \$24,999	14,134	+/-0.5
\$25,000 to \$34,999	14,870	+/-0.6
\$35,000 to \$49,999	20,759	+/-0.8
\$50,000 to \$74,999	24,587	+/-0.6
\$75,000 to \$99,999	16,784	+/-0.6
\$100,000 to \$149,999	18,551	+/-0.6
\$150,000 to \$199,999	8,539	+/-0.4
\$200,000 or more	10,453	+/-0.4
Median income (dollars)	54,163	+/-1,035
Mean income (dollars)	81,167	+/-1,400

Durham County Household Income



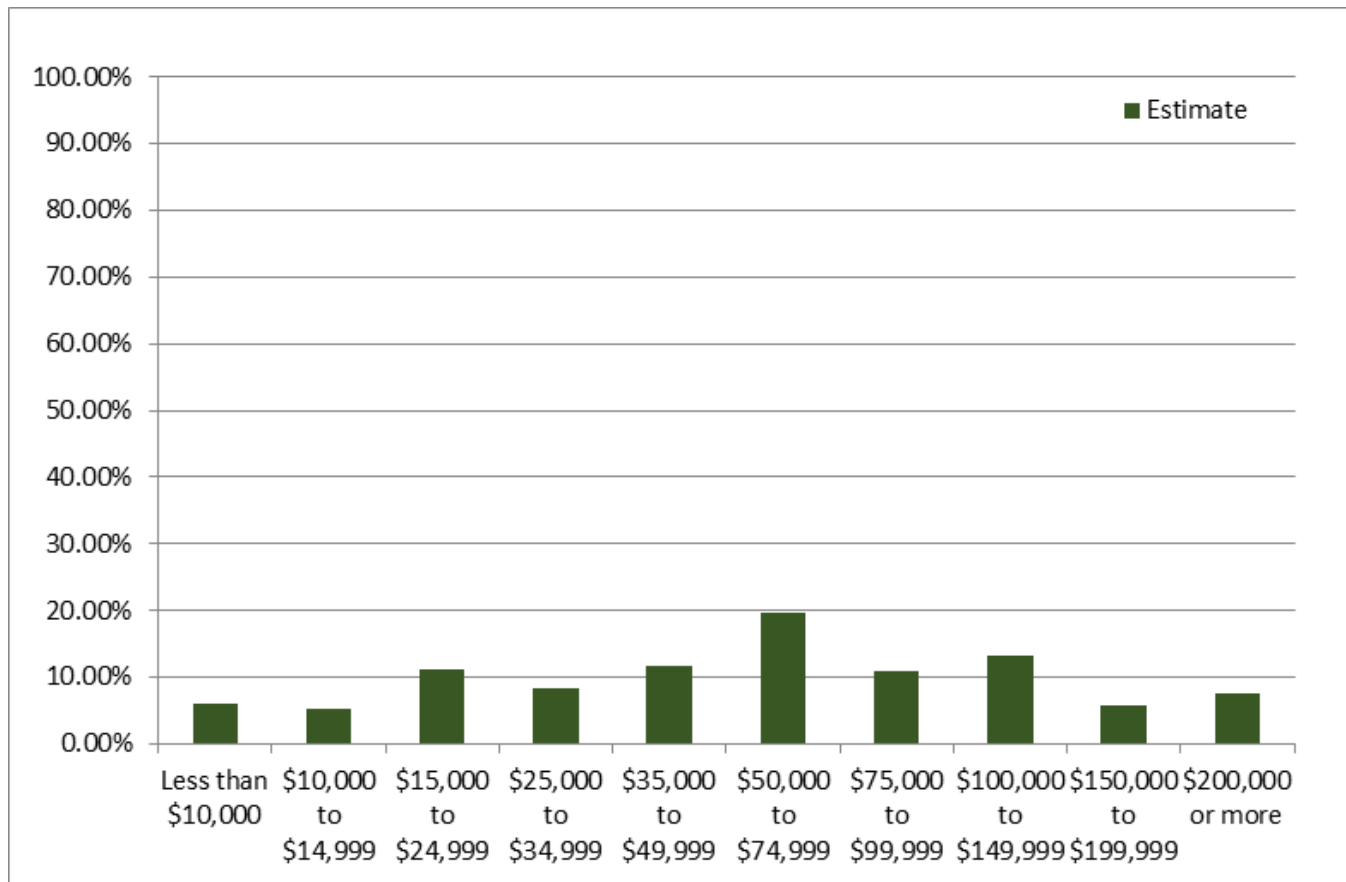
Subject	Households	
	Estimate	Margin of Error +/-
Total	118,681	+/-918
Less than \$10,000	8,901	+/-0.6
\$10,000 to \$14,999	5,459	+/-0.5
\$15,000 to \$24,999	11,749	+/-0.6
\$25,000 to \$34,999	12,224	+/-0.7
\$35,000 to \$49,999	16,615	+/-0.8
\$50,000 to \$74,999	20,888	+/-0.6
\$75,000 to \$99,999	14,598	+/-0.7
\$100,000 to \$149,999	15,429	+/-0.7
\$150,000 to \$199,999	6,409	+/-0.4
\$200,000 or more	6,409	+/-0.4
Median income (dollars)	54,093	+/-1,074
Mean income (dollars)	76,544	+/-1,751

Orange County Household Income



Subject	Households	
	Estimate	Margin of Error +/-
Total	51,728	+/-709
Less than \$10,000	3,931	+/-0.7
\$10,000 to \$14,999	2,224	+/-0.6
\$15,000 to \$24,999	4,138	+/-0.9
\$25,000 to \$34,999	4,500	+/-0.9
\$35,000 to \$49,999	6,983	+/-1.1
\$50,000 to \$74,999	7,966	+/-1.1
\$75,000 to \$99,999	5,173	+/-0.9
\$100,000 to \$149,999	6,932	+/-0.9
\$150,000 to \$199,999	3,776	+/-0.7
\$200,000 or more	6,156	+/-0.7
Median income (dollars)	61,130	+/-1995
Mean income (dollars)	98,055	+/-2914

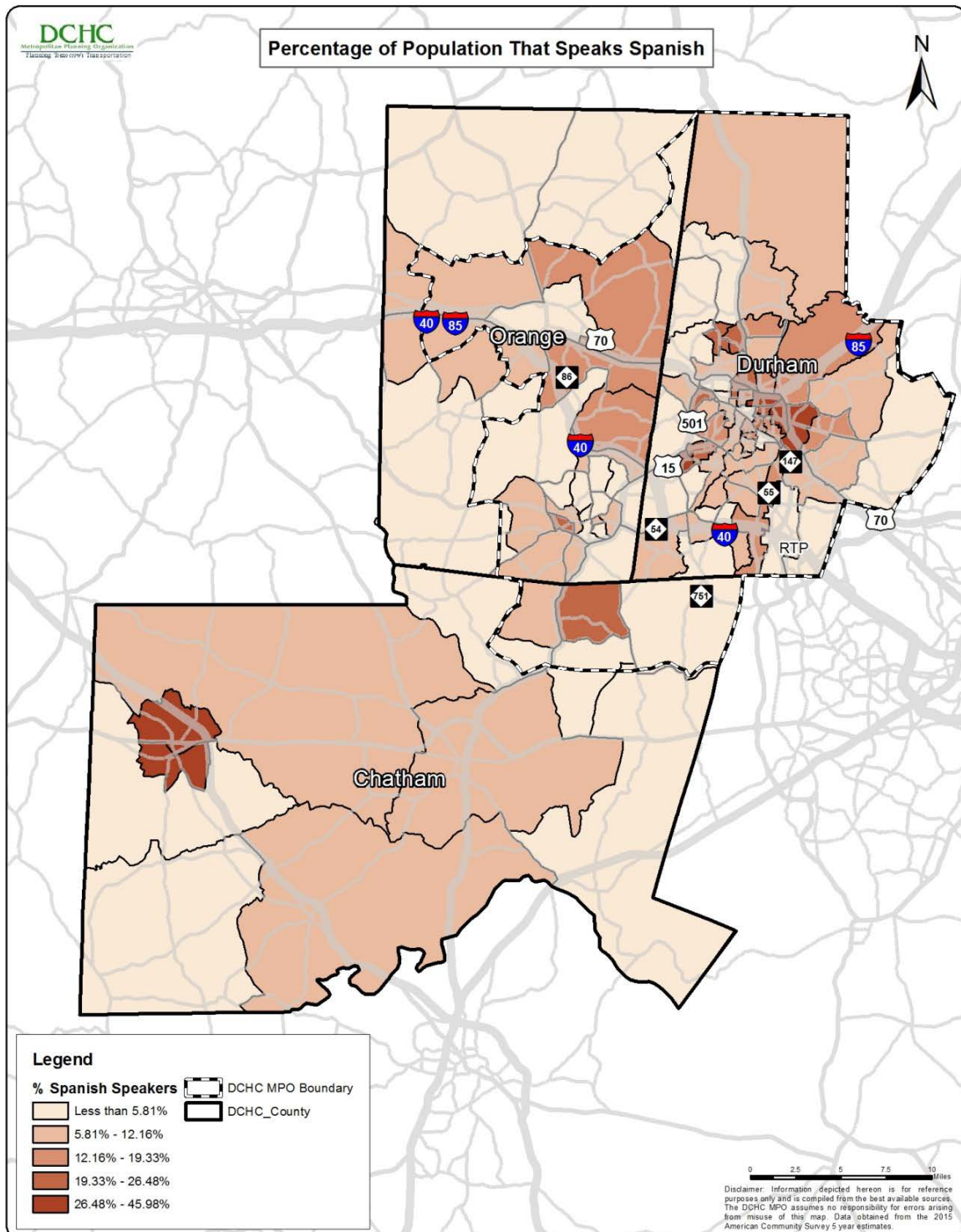
Chatham County Household Income



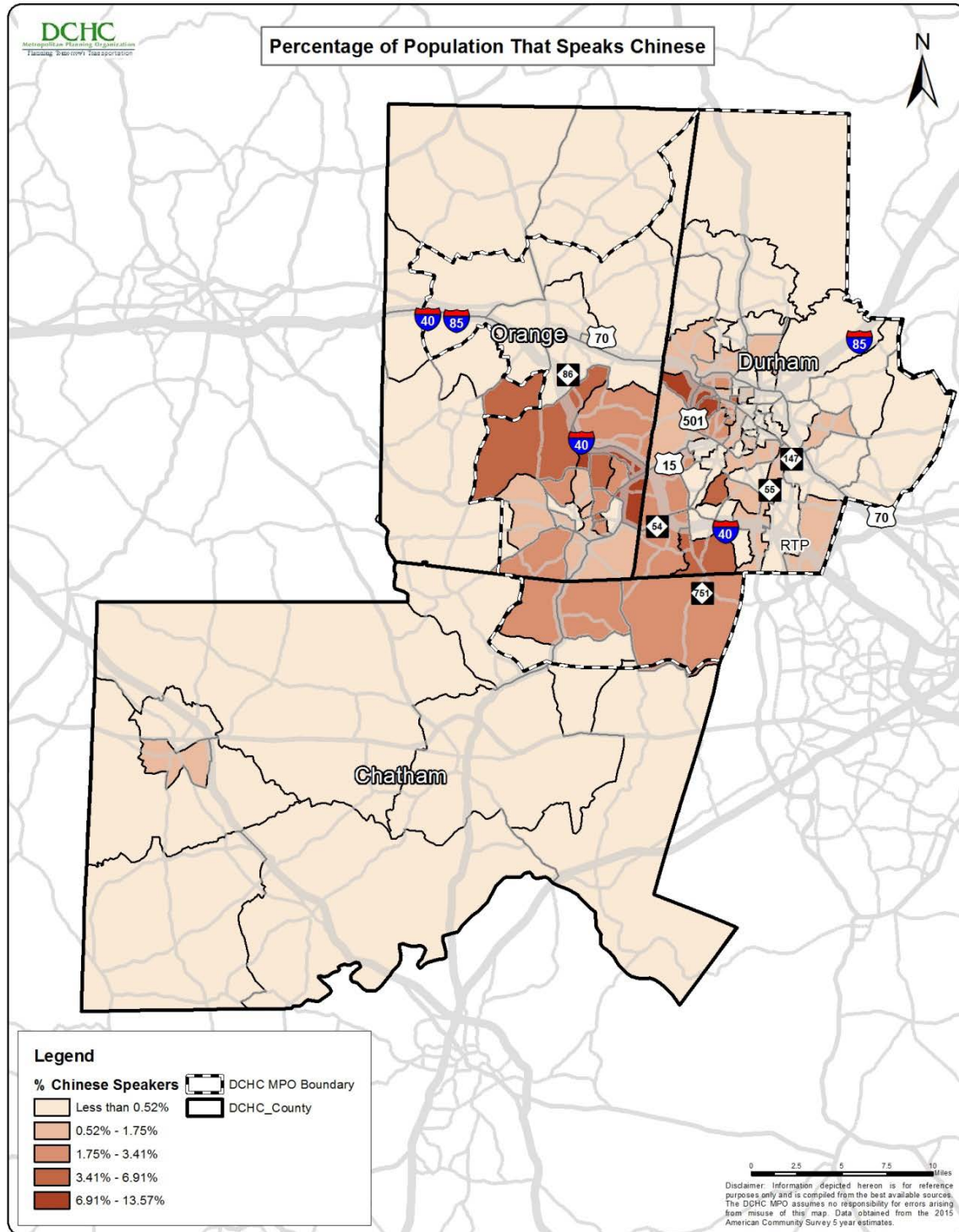
Subject	Households	
	Estimate	Margin of Error +/-
Total	27,397	+/-391
Less than \$10,000	1671	+/-1.1
\$10,000 to \$14,999	1452	+/-0.9
\$15,000 to \$24,999	3068	+/-1.3
\$25,000 to \$34,999	2301	+/-1.1
\$35,000 to \$49,999	3233	+/-1.3
\$50,000 to \$74,999	5370	+/-1.5
\$75,000 to \$99,999	3014	+/-1.2
\$100,000 to \$149,999	3616	+/-1.2
\$150,000 to \$199,999	1589	+/-1.0
\$200,000 or more	2082	+/-1.0
Median income (dollars)	58,555	+/-2,360
Mean income (dollars)	83,527	+/-3,502

APPENDIX H
Demographic Maps (EJ)
LEP

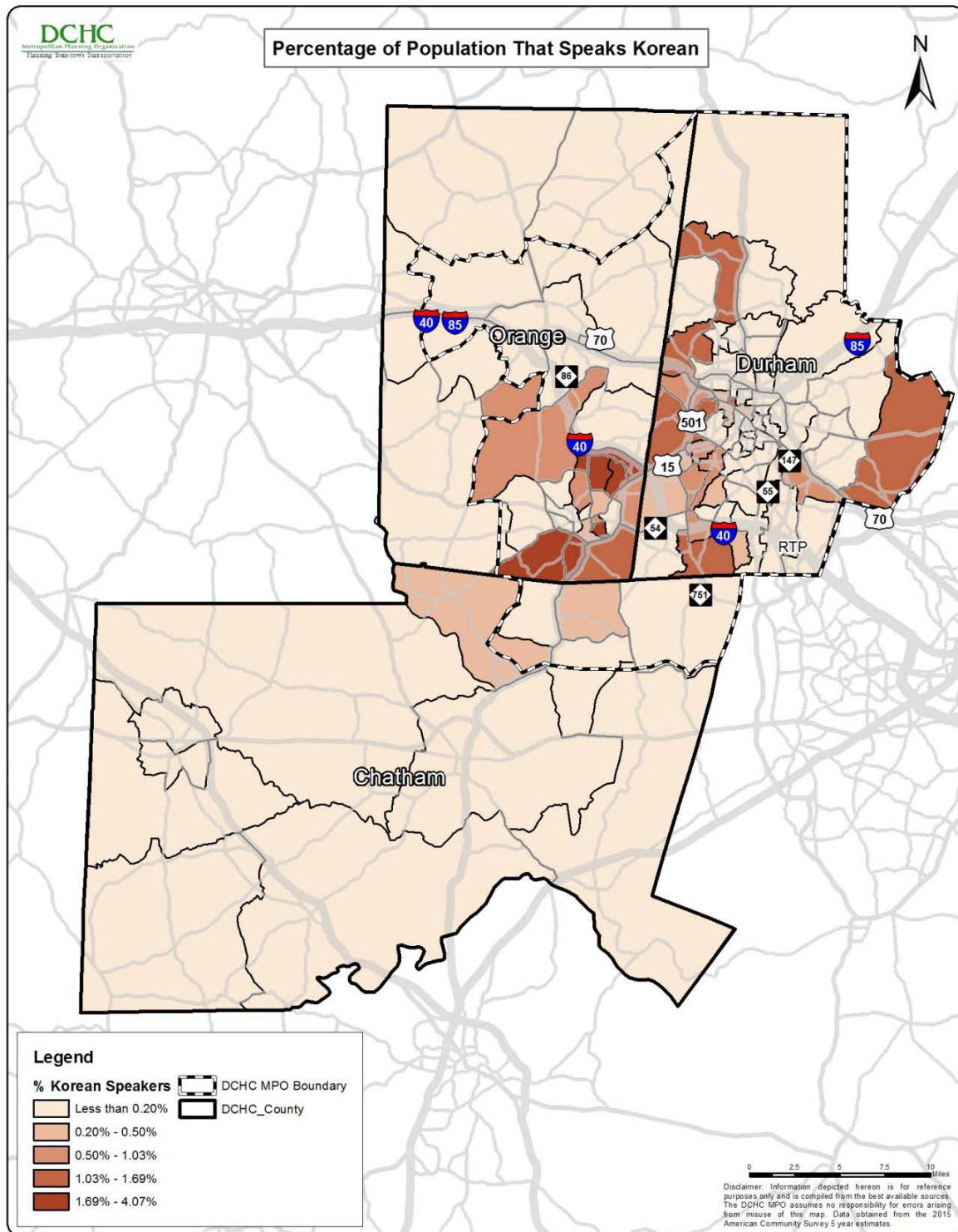
The following maps display the percentage of those with limited English proficiency by language.
Spanish Speakers



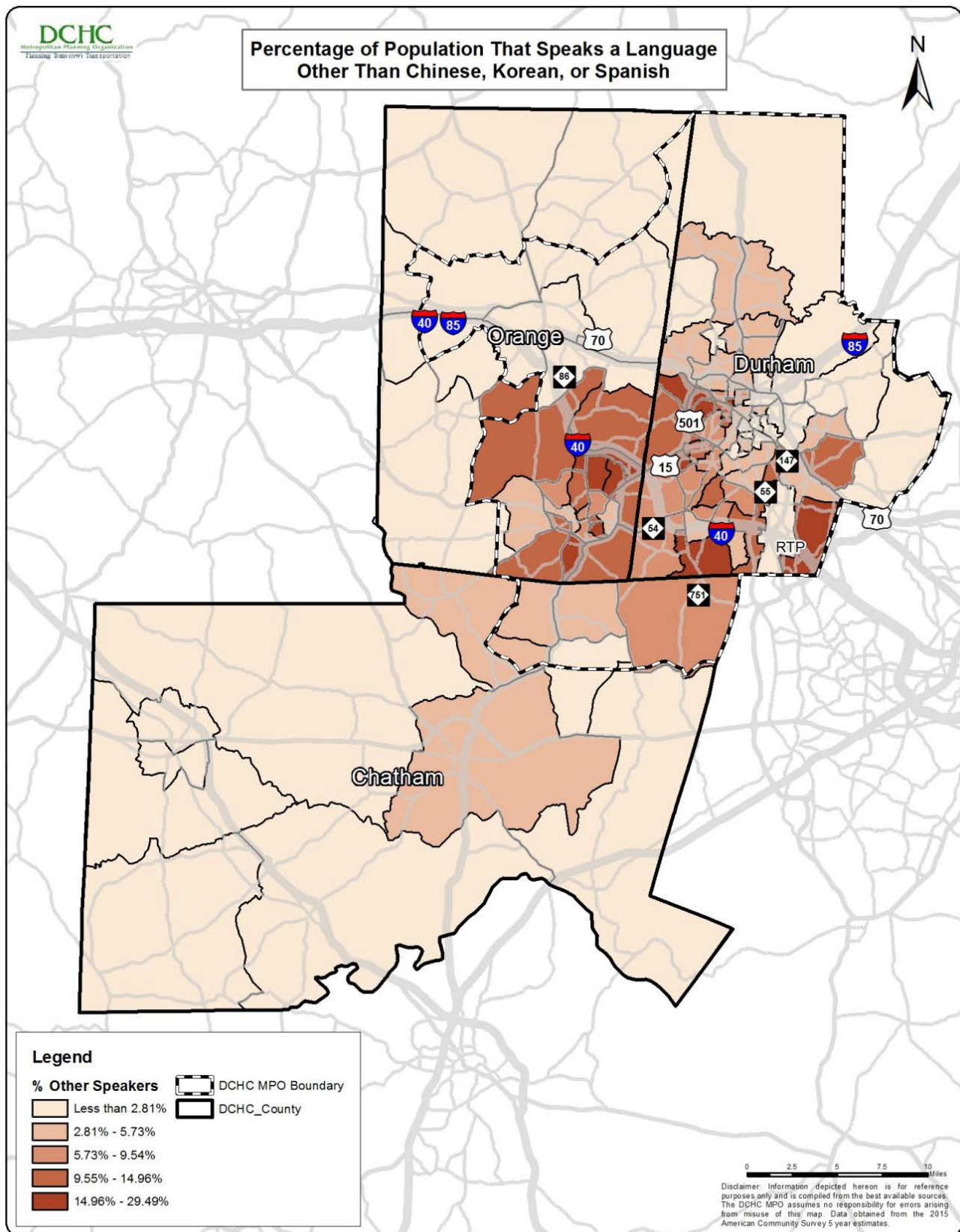
Chinese Speakers



Korean Speakers

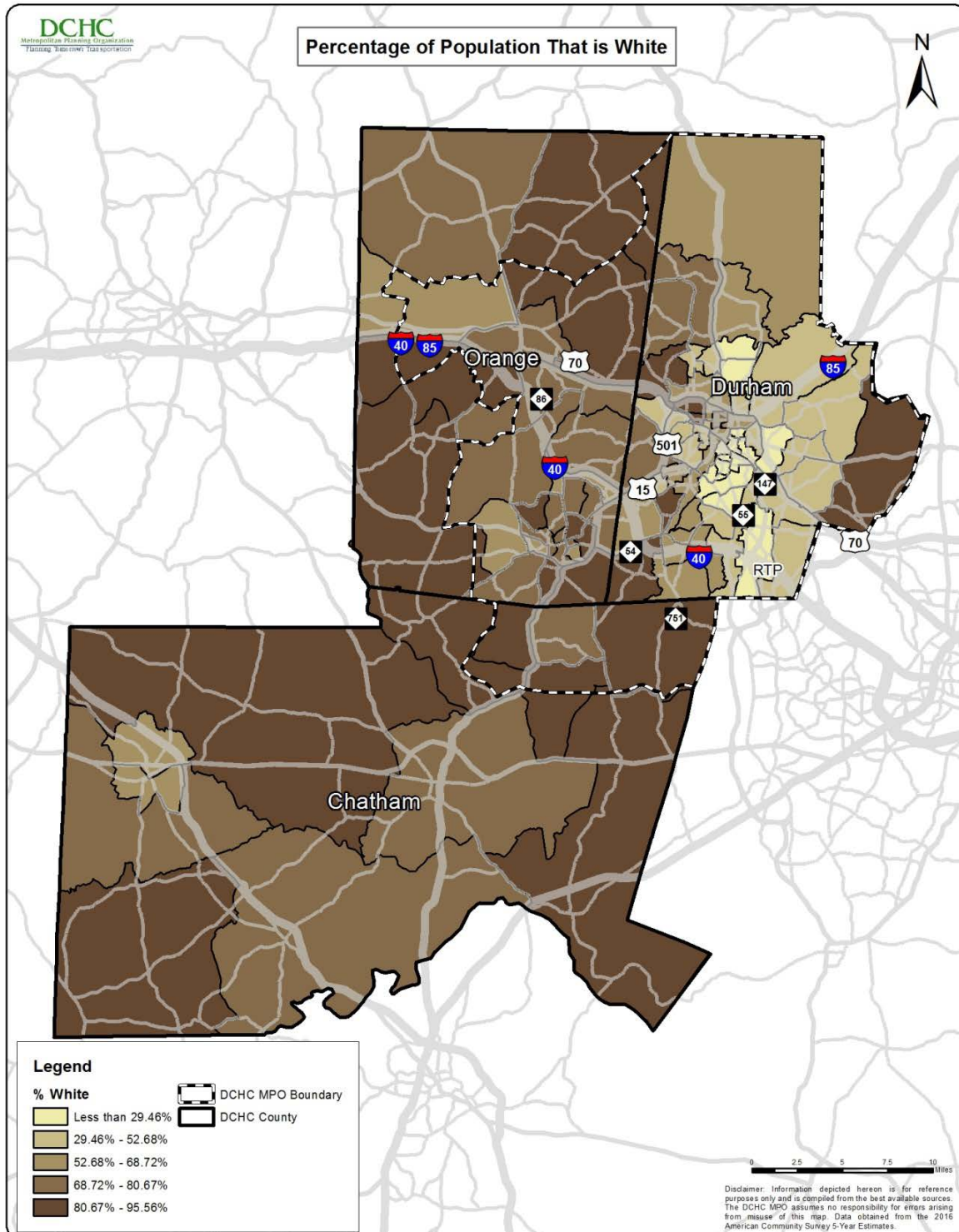


Other Language

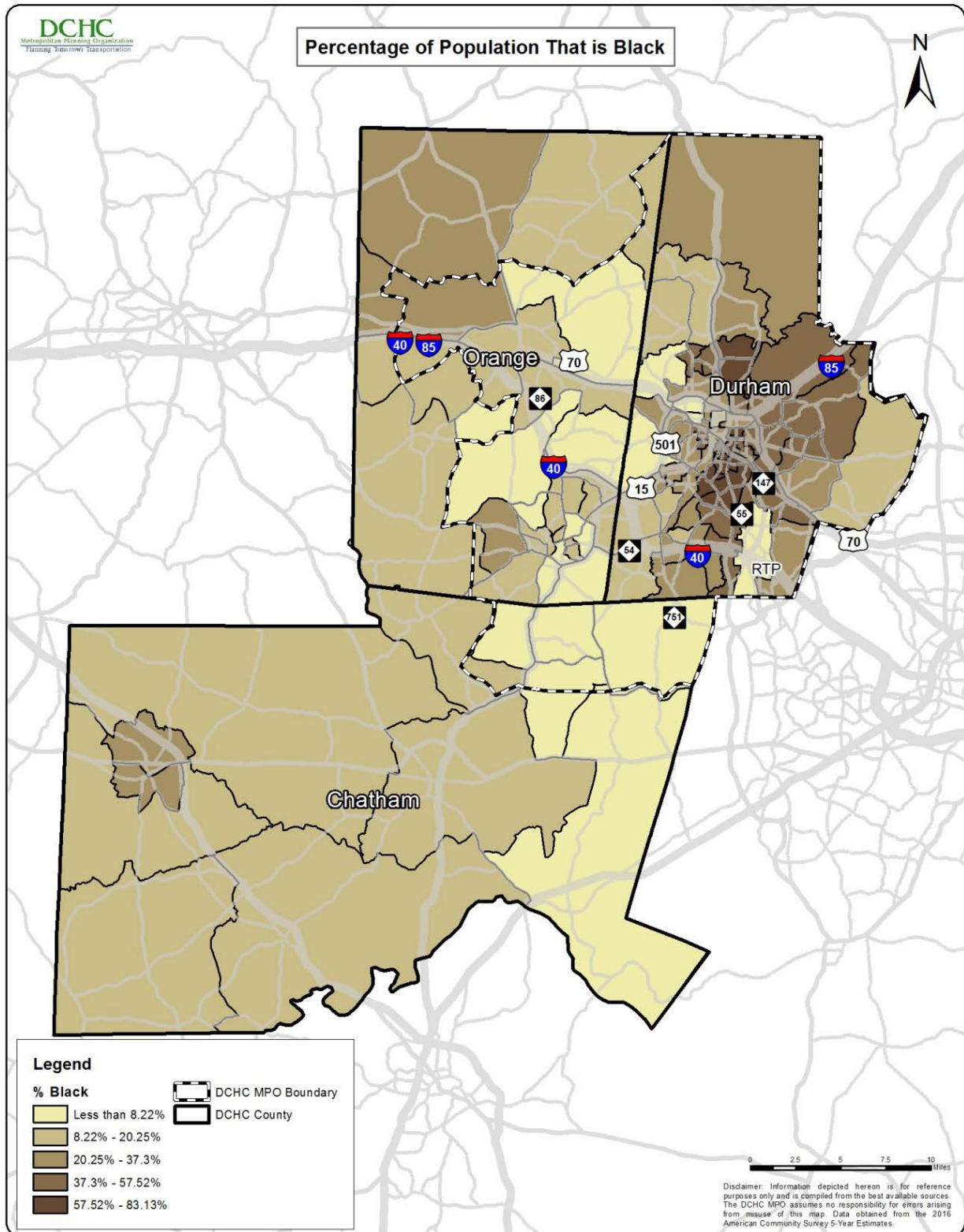


Race and Ethnicity

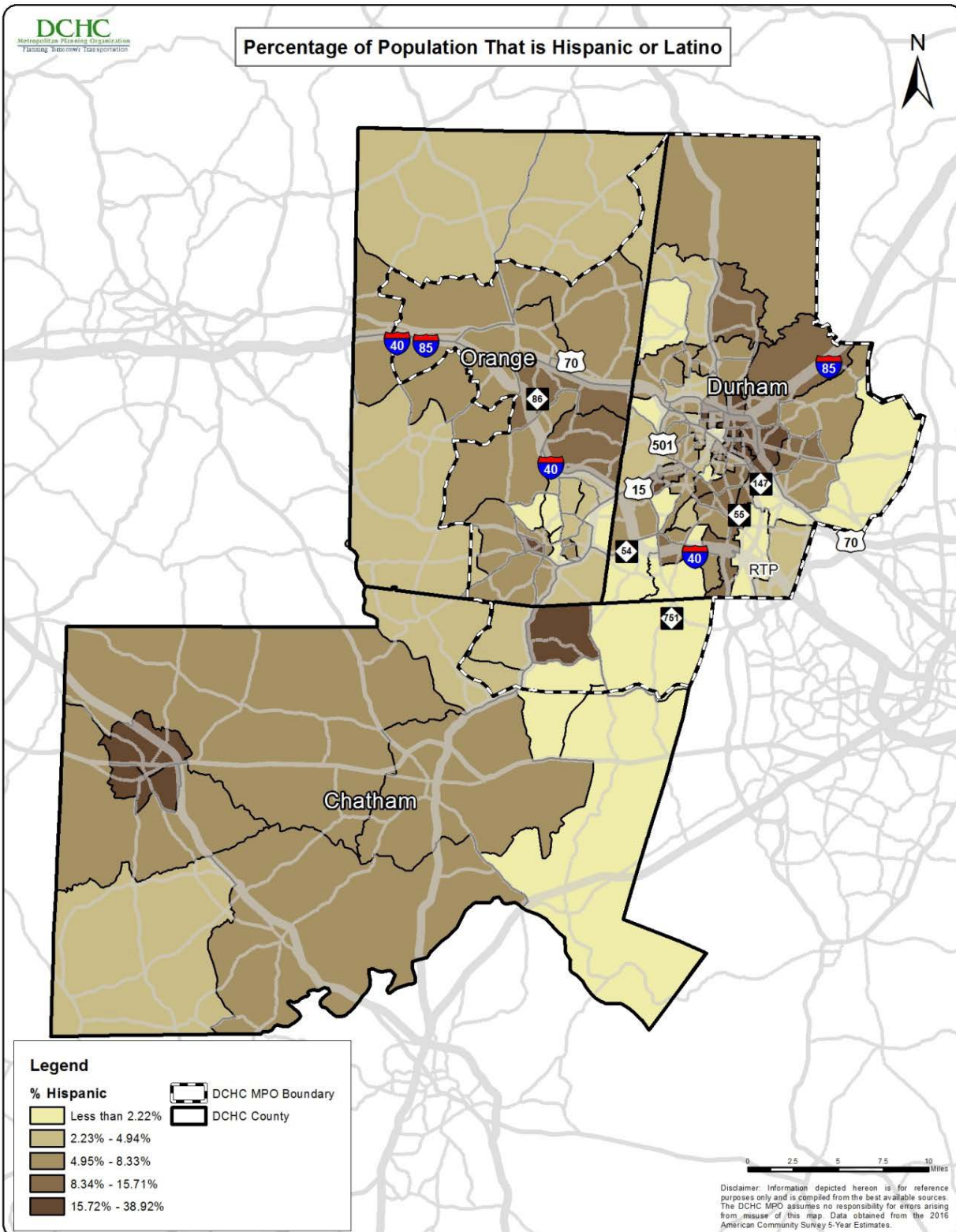
*The following maps display the percentage of certain race and ethnicities.
White Population*



Black Population



Hispanic or Latino Population



DCHC
Durham-Chapel Hill Metropolitan Statistical Area
Planning - Improving - Growing

Percentage of Population That is Not White, Black, or Hispanic

Legend

% Other

- Less than 4.97%
- 4.97% - 9.41%
- 9.41% - 14.61%
- 14.61% - 22.11%
- 22.11% - 33.56%

DCHC MPO Boundary
DCHC County

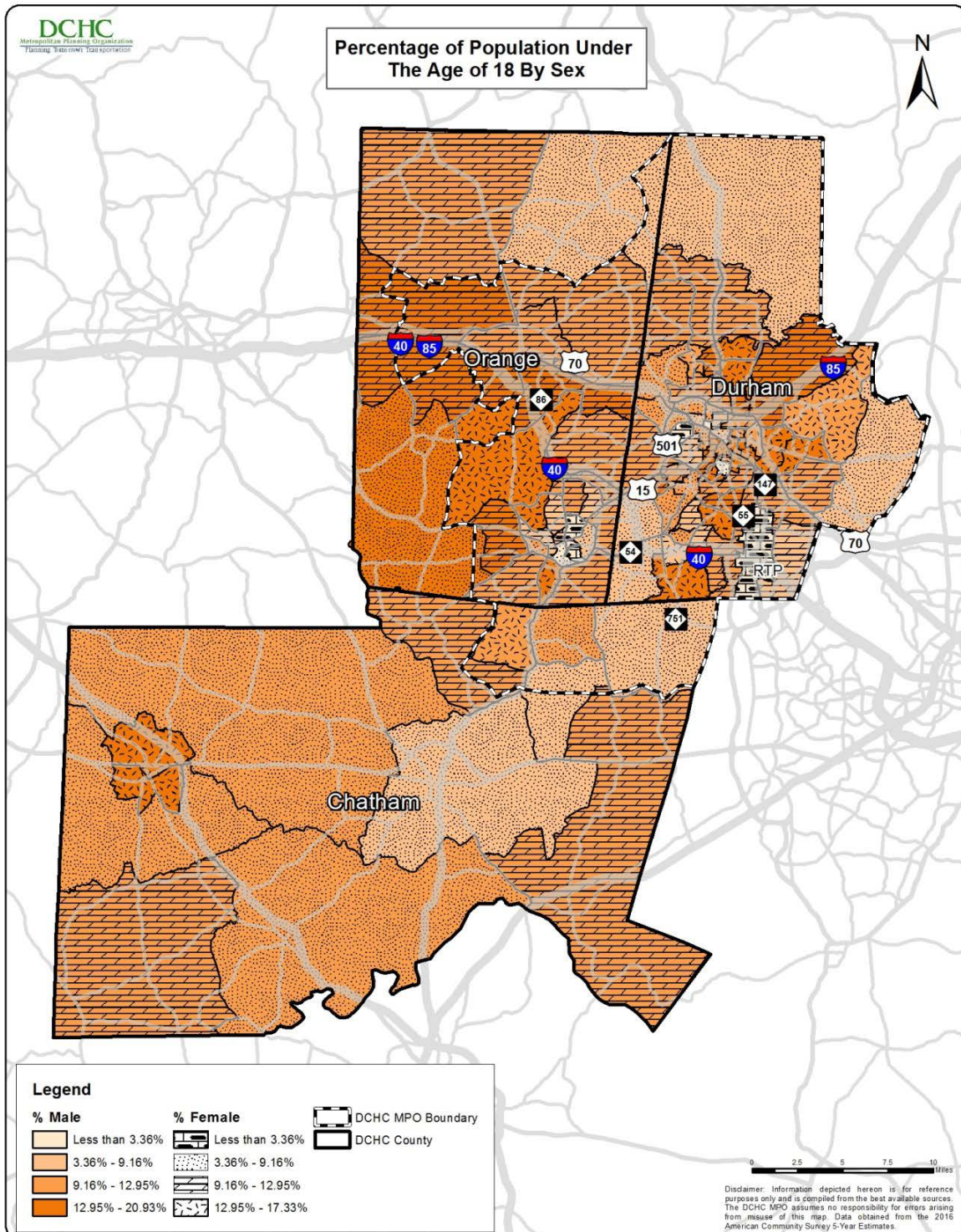
0 2.5 5 7.5 10 Miles

Disclaimer: Information depicted hereon is for reference purposes only and is compiled from the best available sources. The DCHC MPO assumes no responsibility for errors arising from misuse of this map. Data obtained from the 2010 American Community Survey 5-Year Estimates.

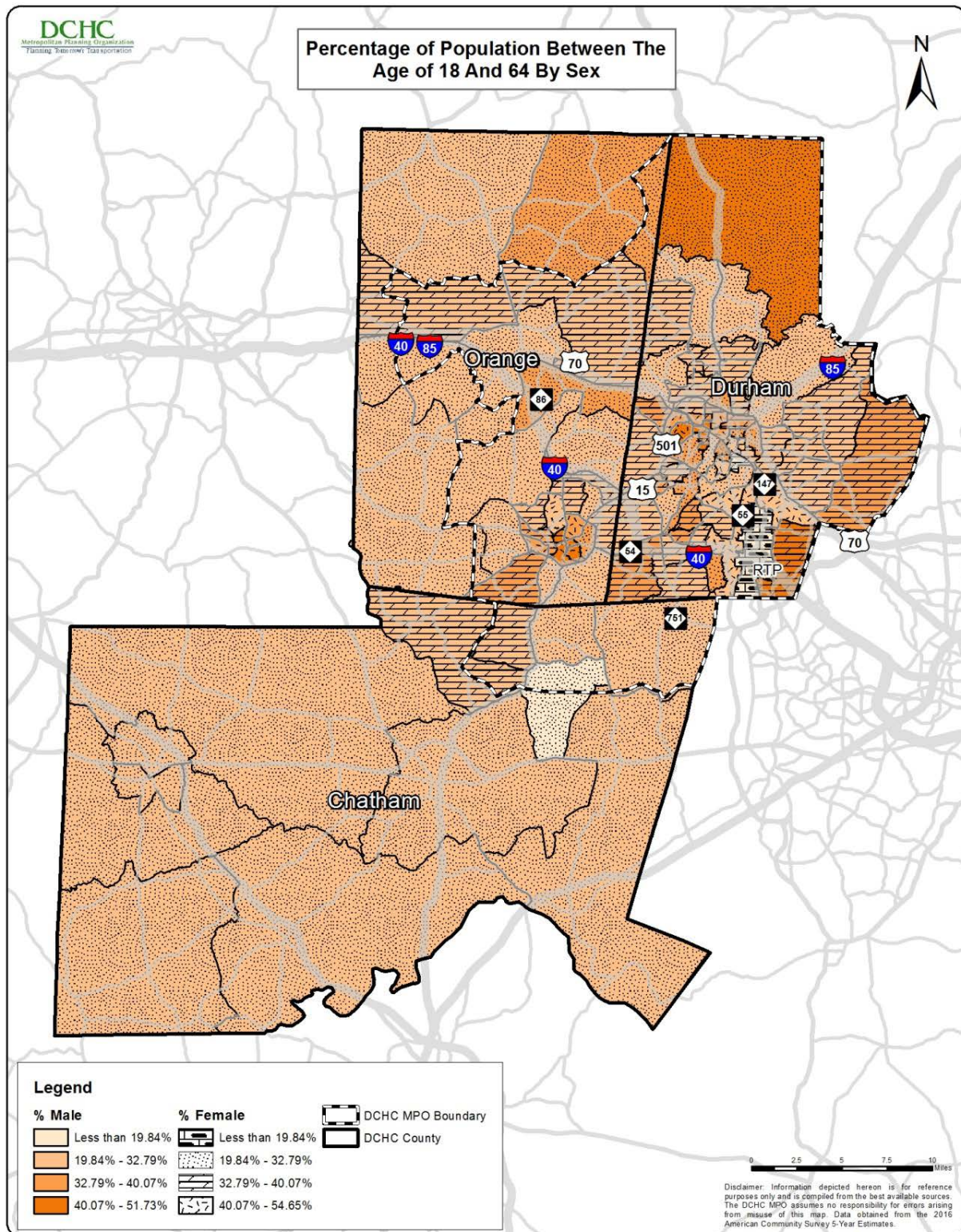
Age and Sex

The following maps display the percentages of various age and sex demographics.

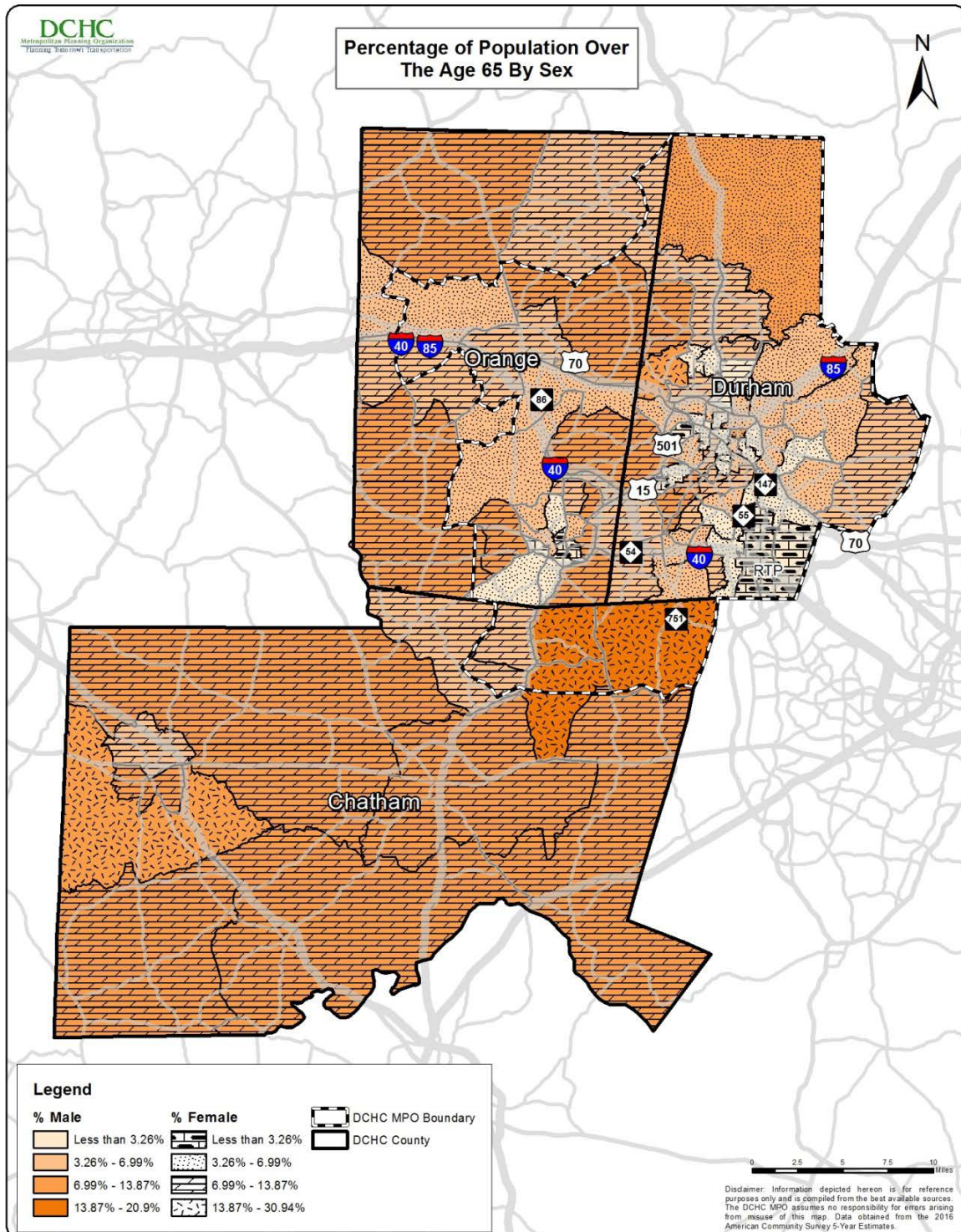
Under 18



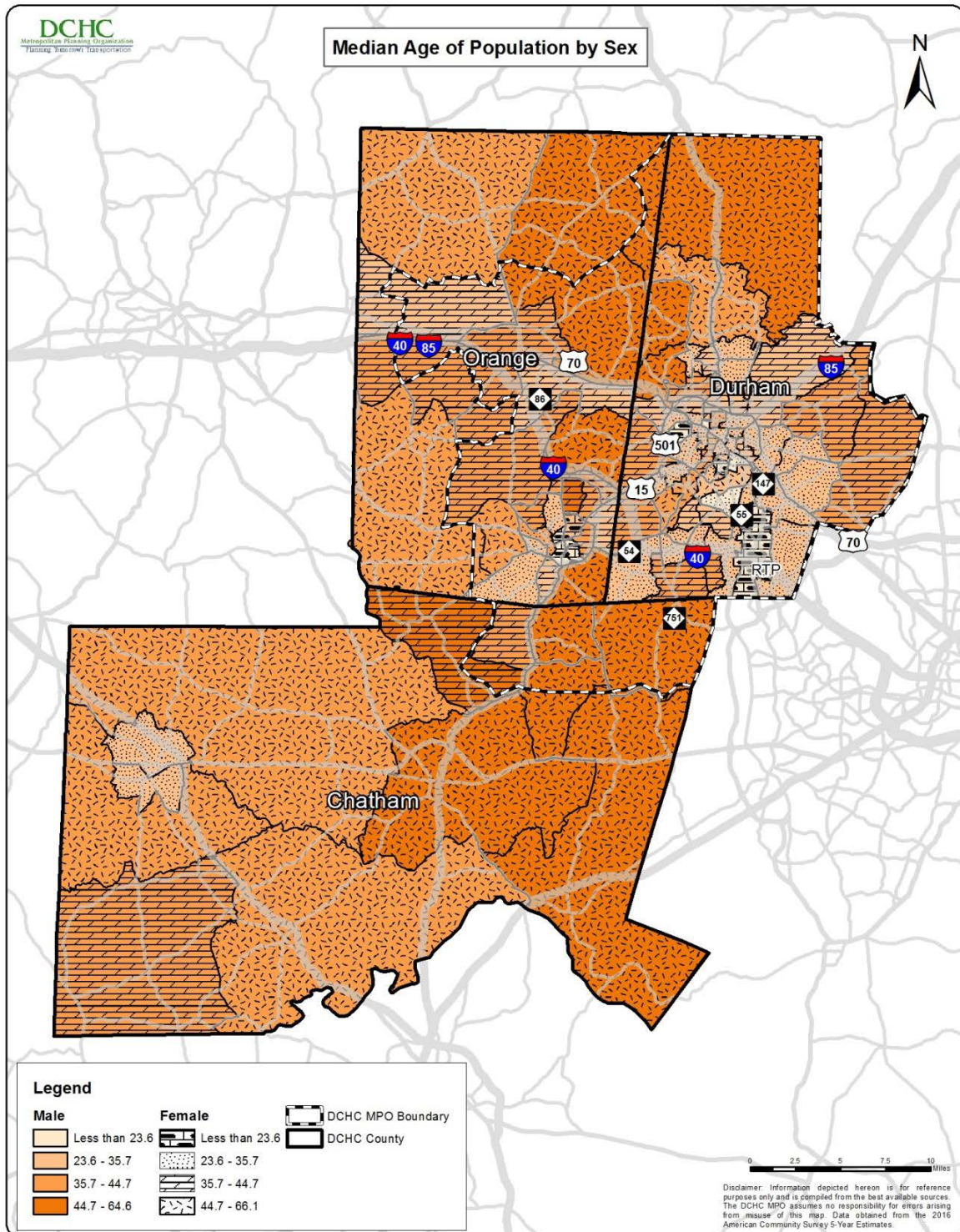
Ages 18-64



Over 65



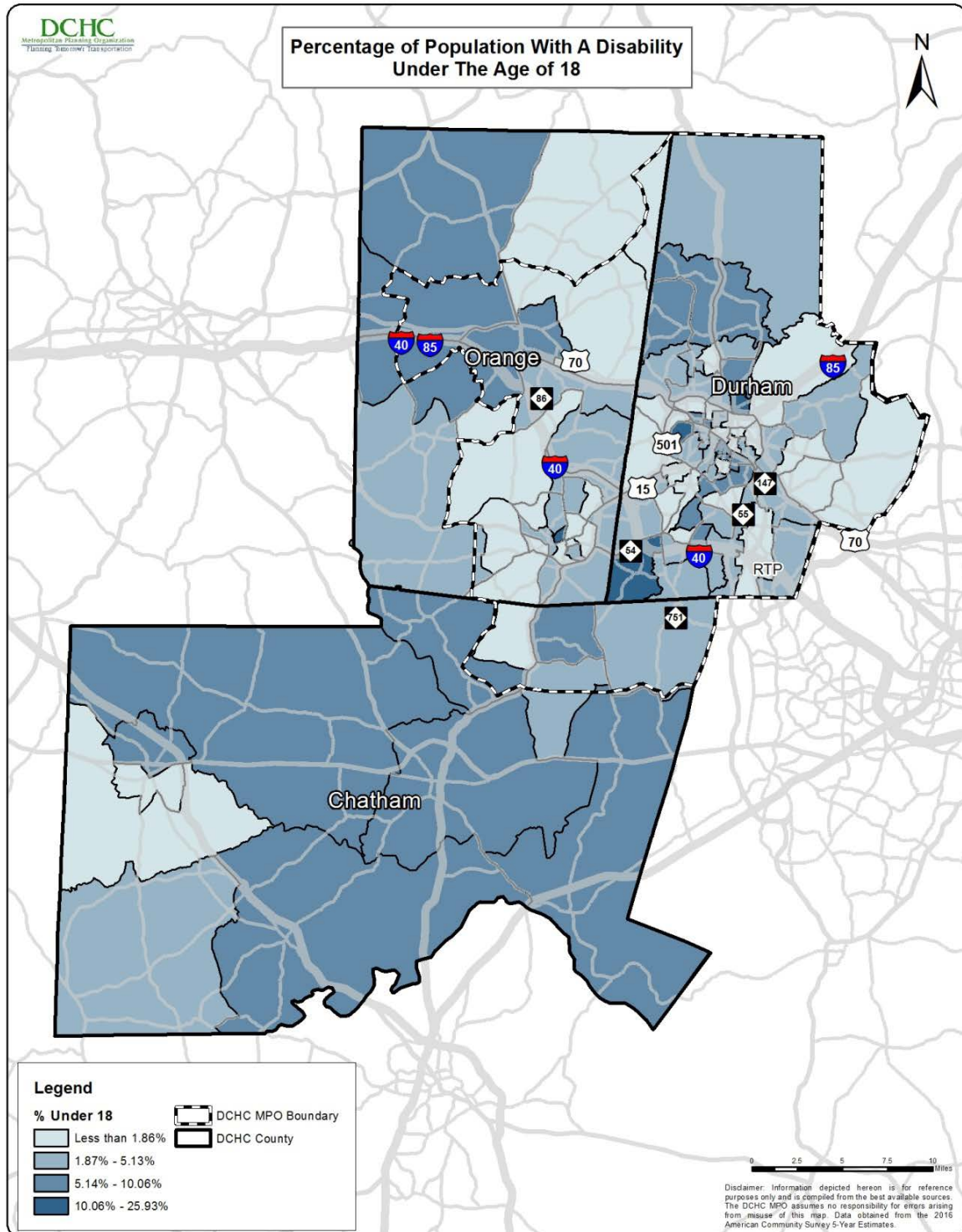
Median Age



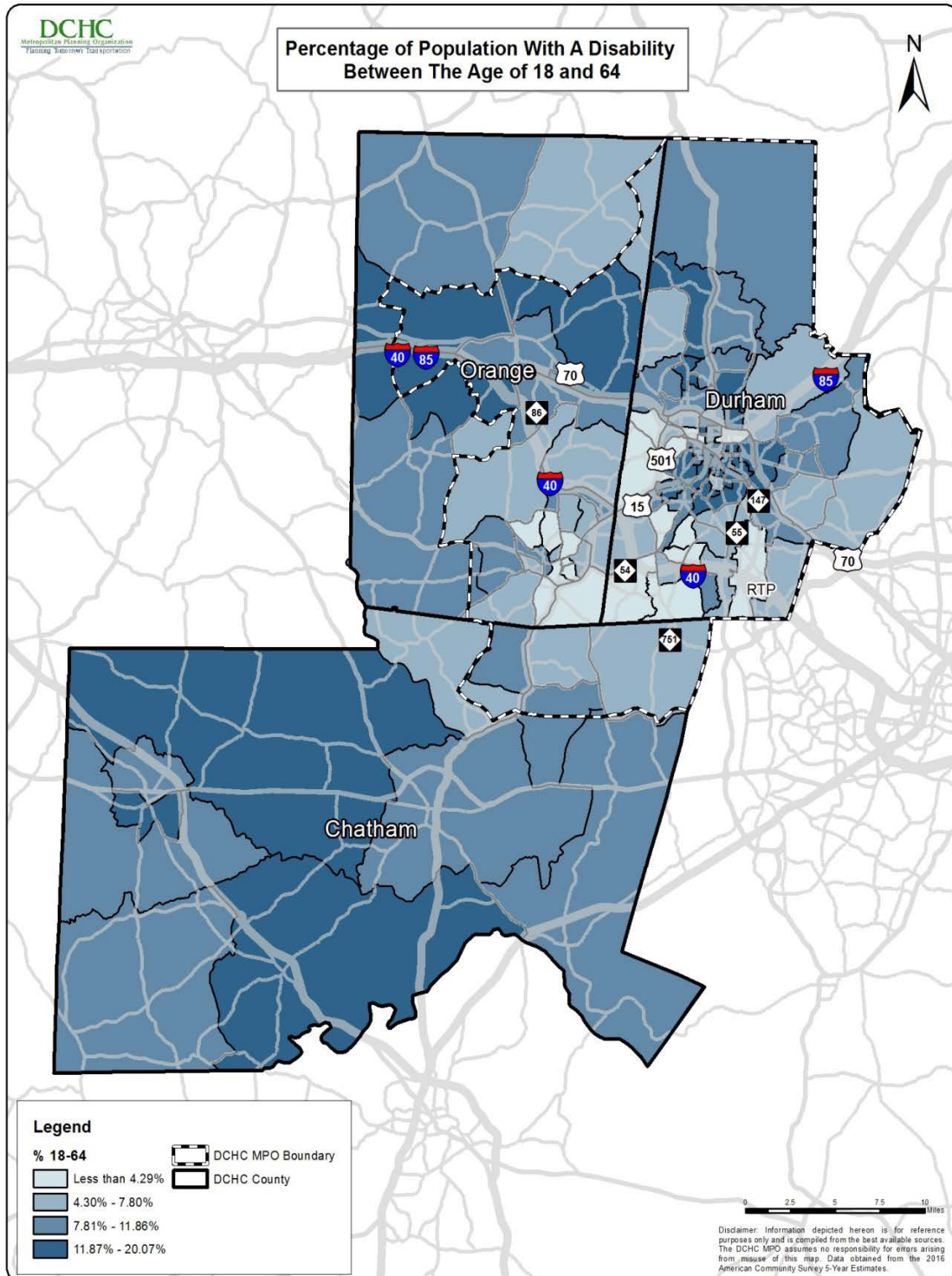
Disability

The following maps display the percentages of the population with a disability.

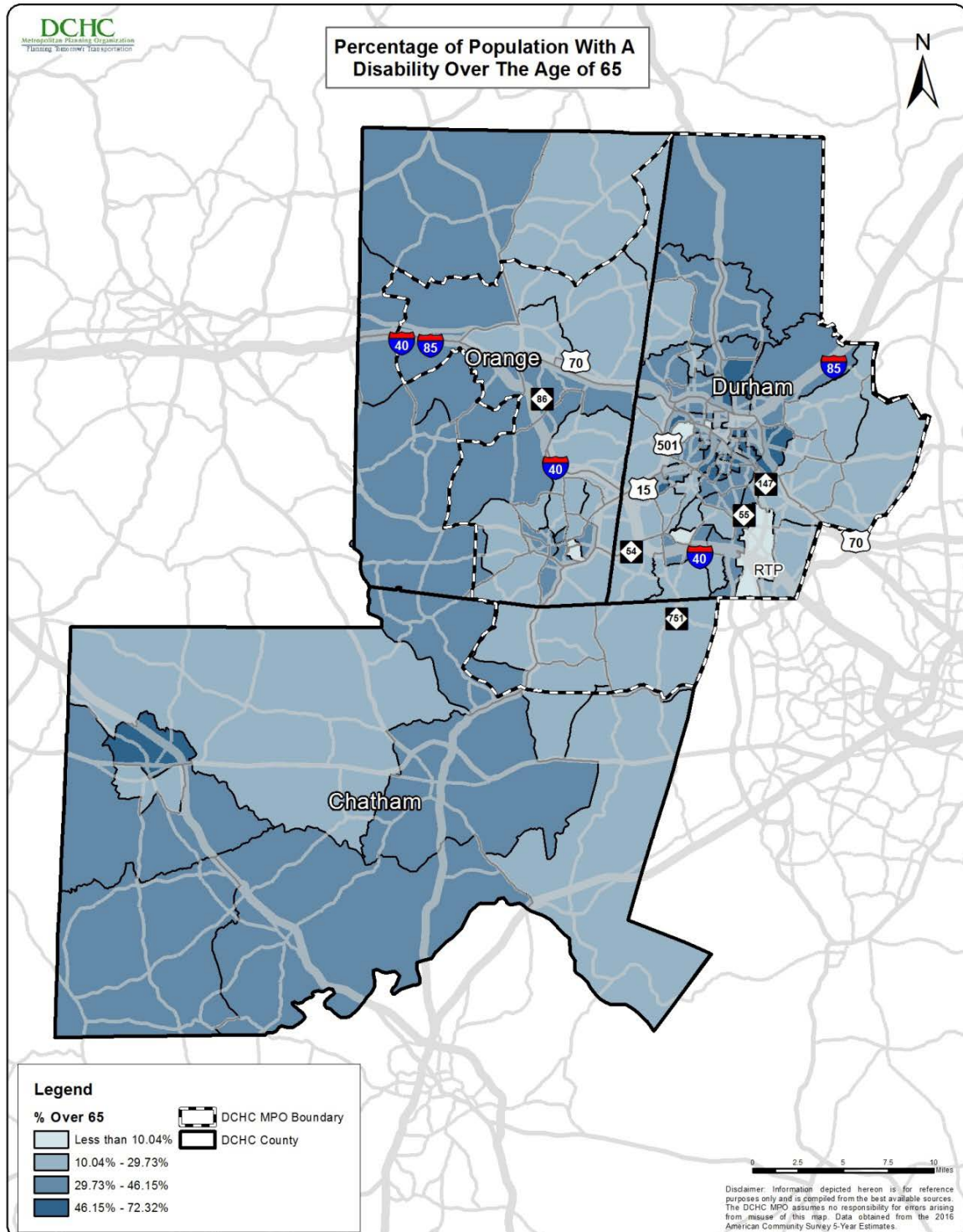
Under 18



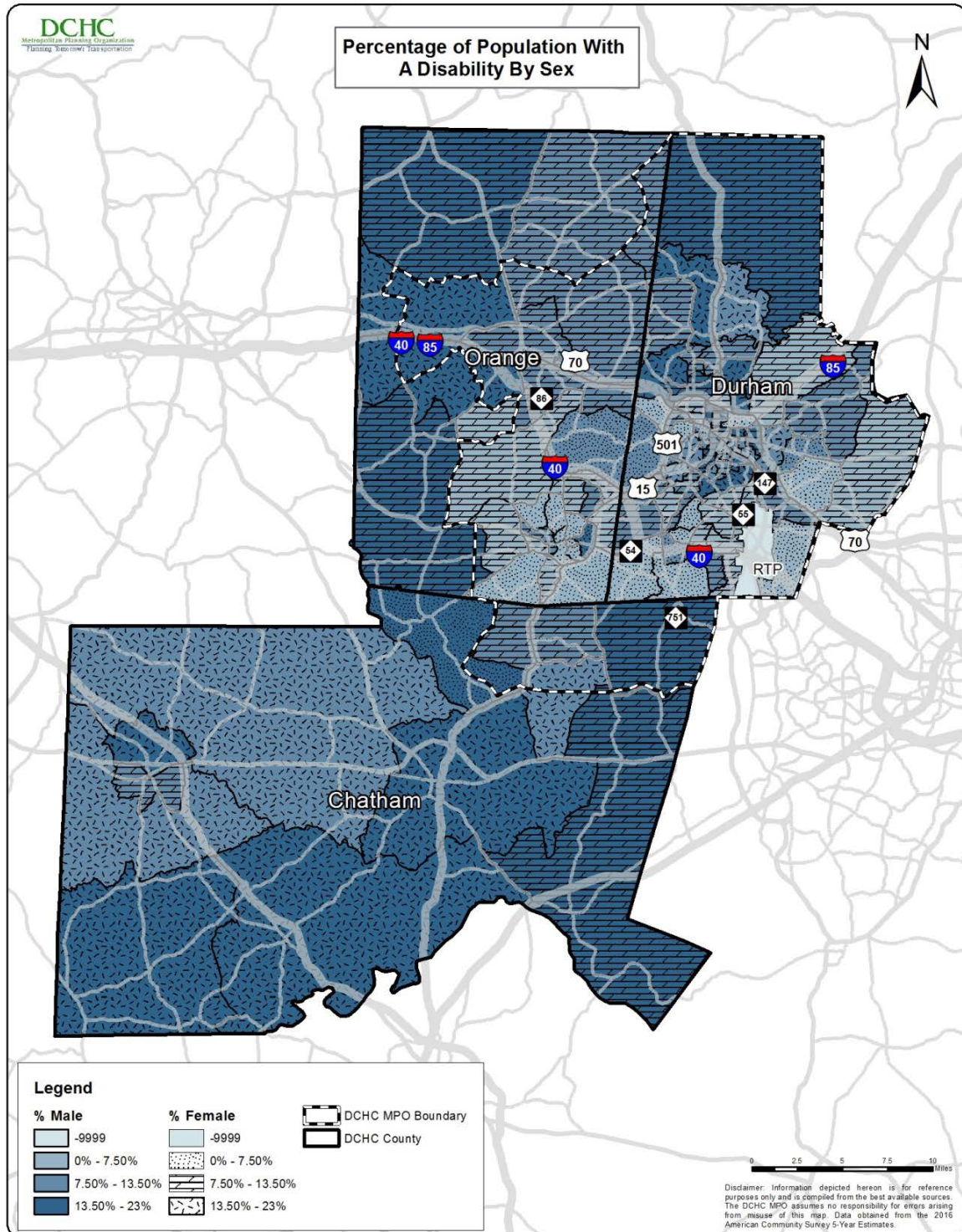
Ages 18-64



Over 65



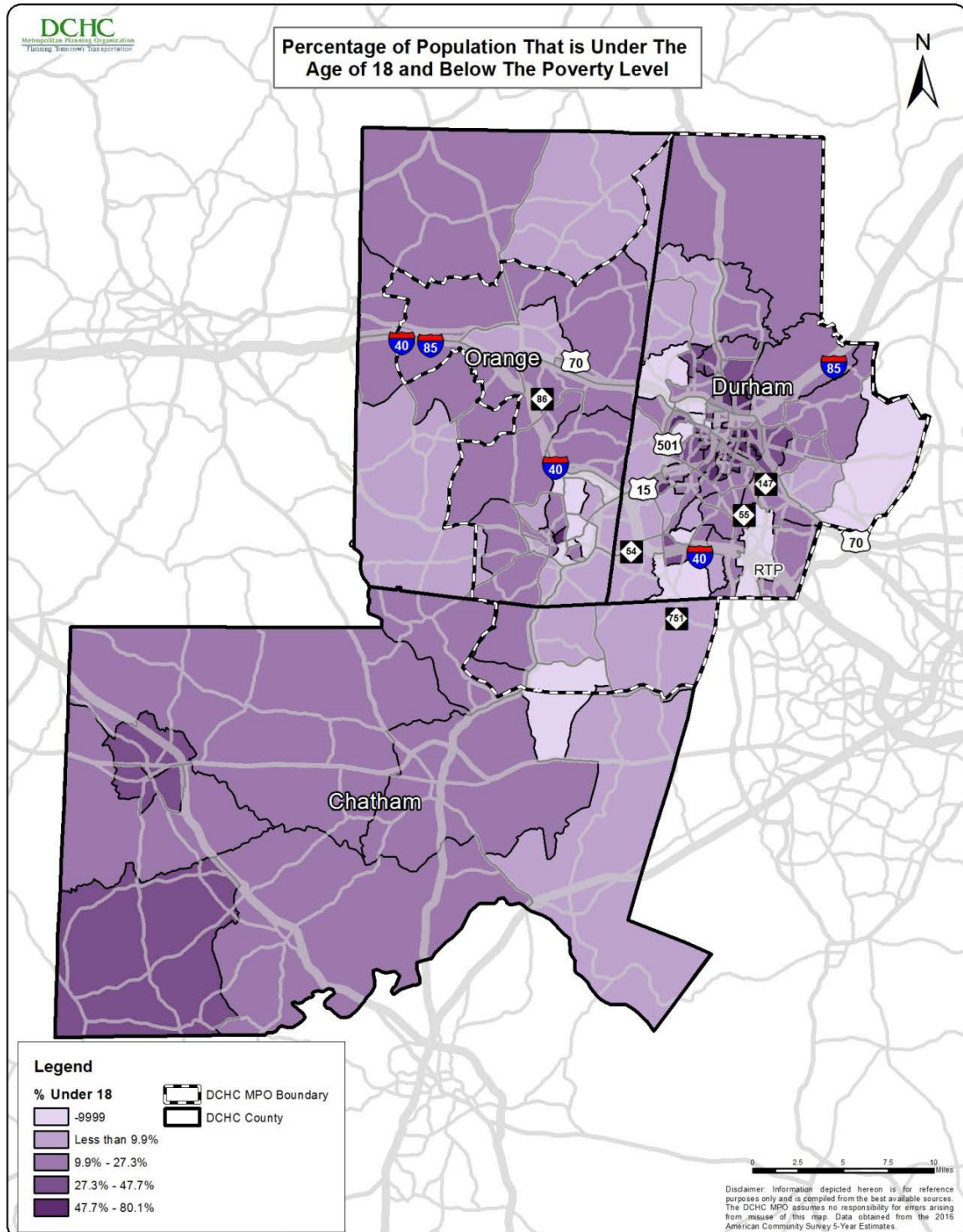
Sex



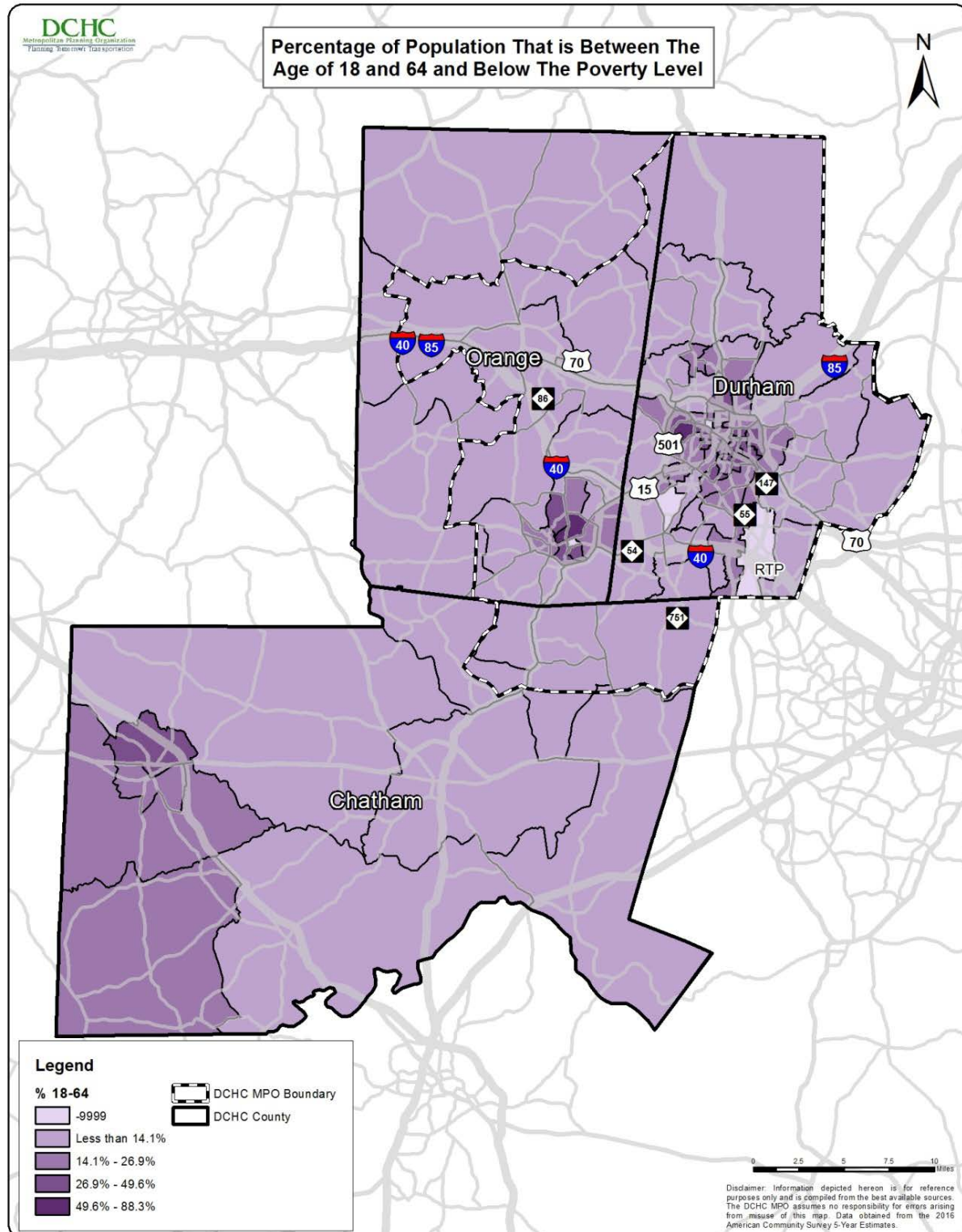
Poverty

The following maps display the percentages of various demographics for whom poverty is determined..

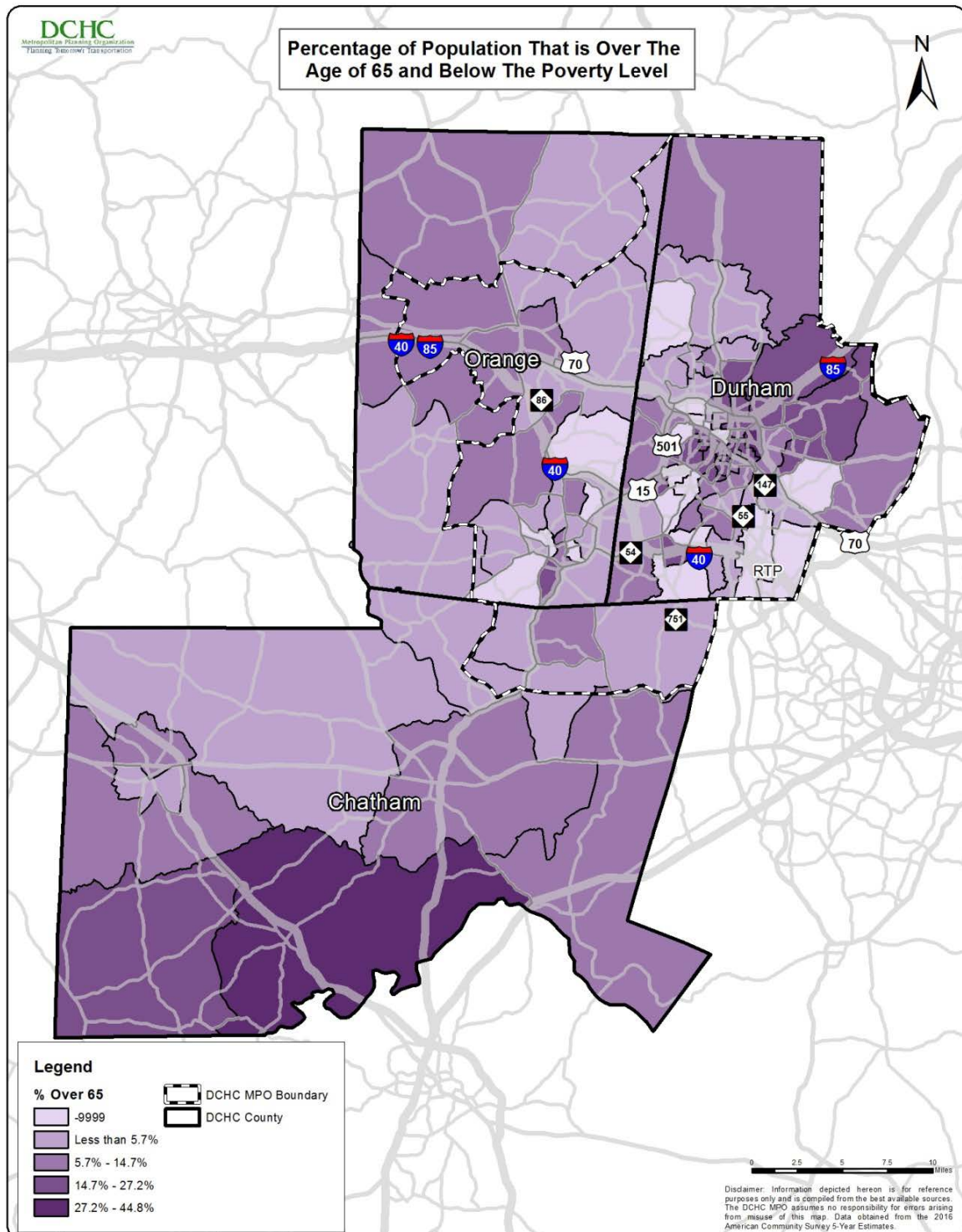
Under 18



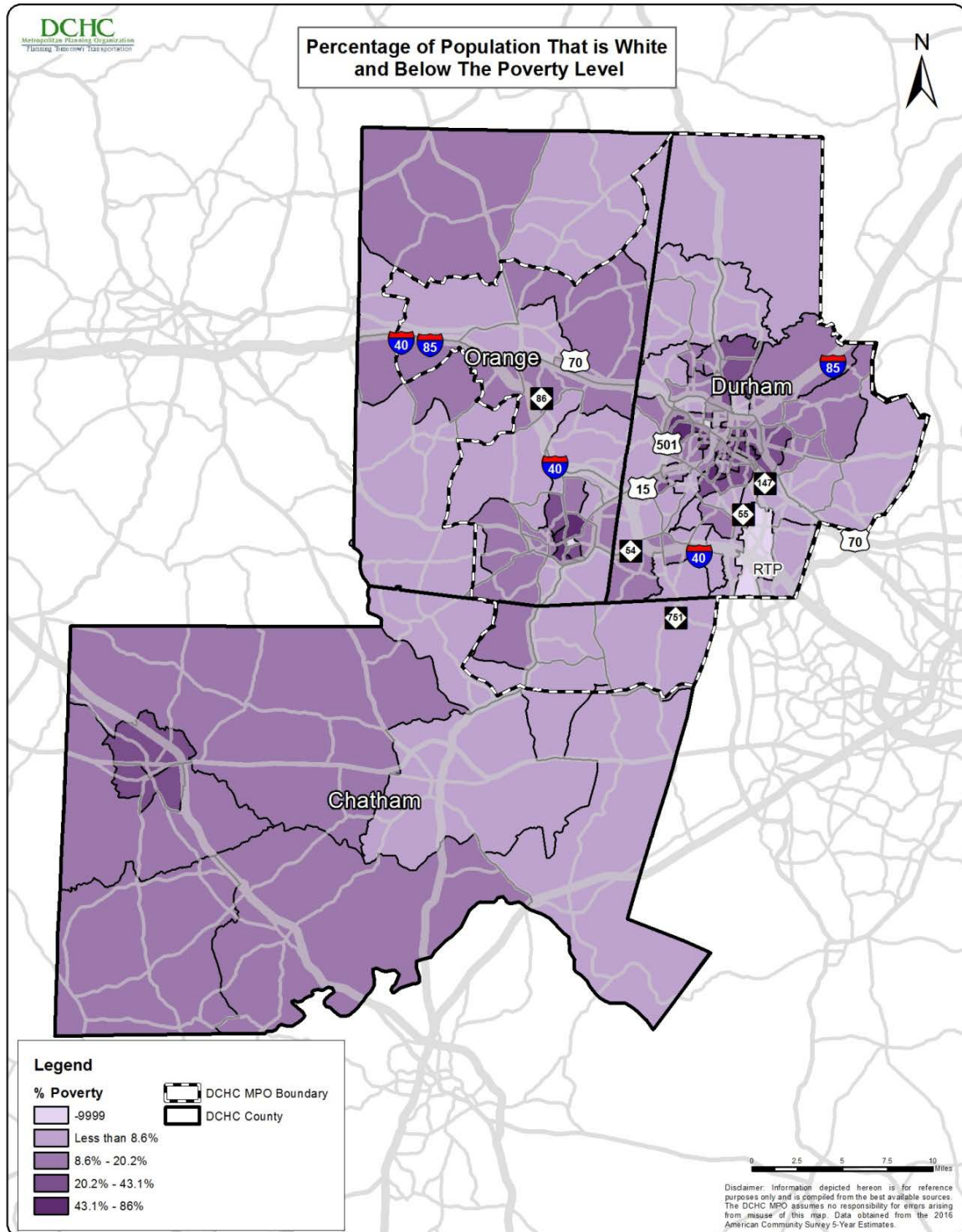
Ages 18-64



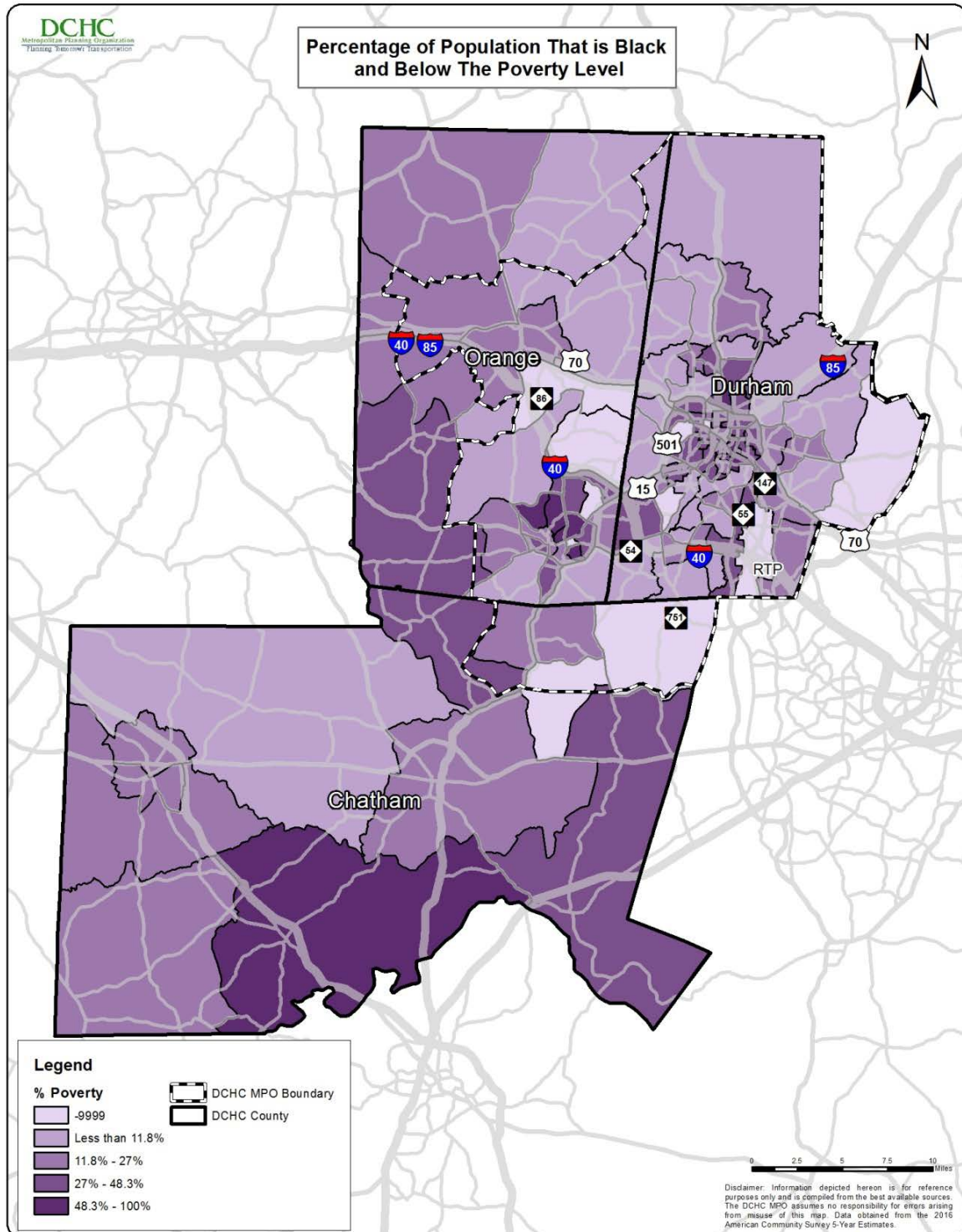
Ages 18-64



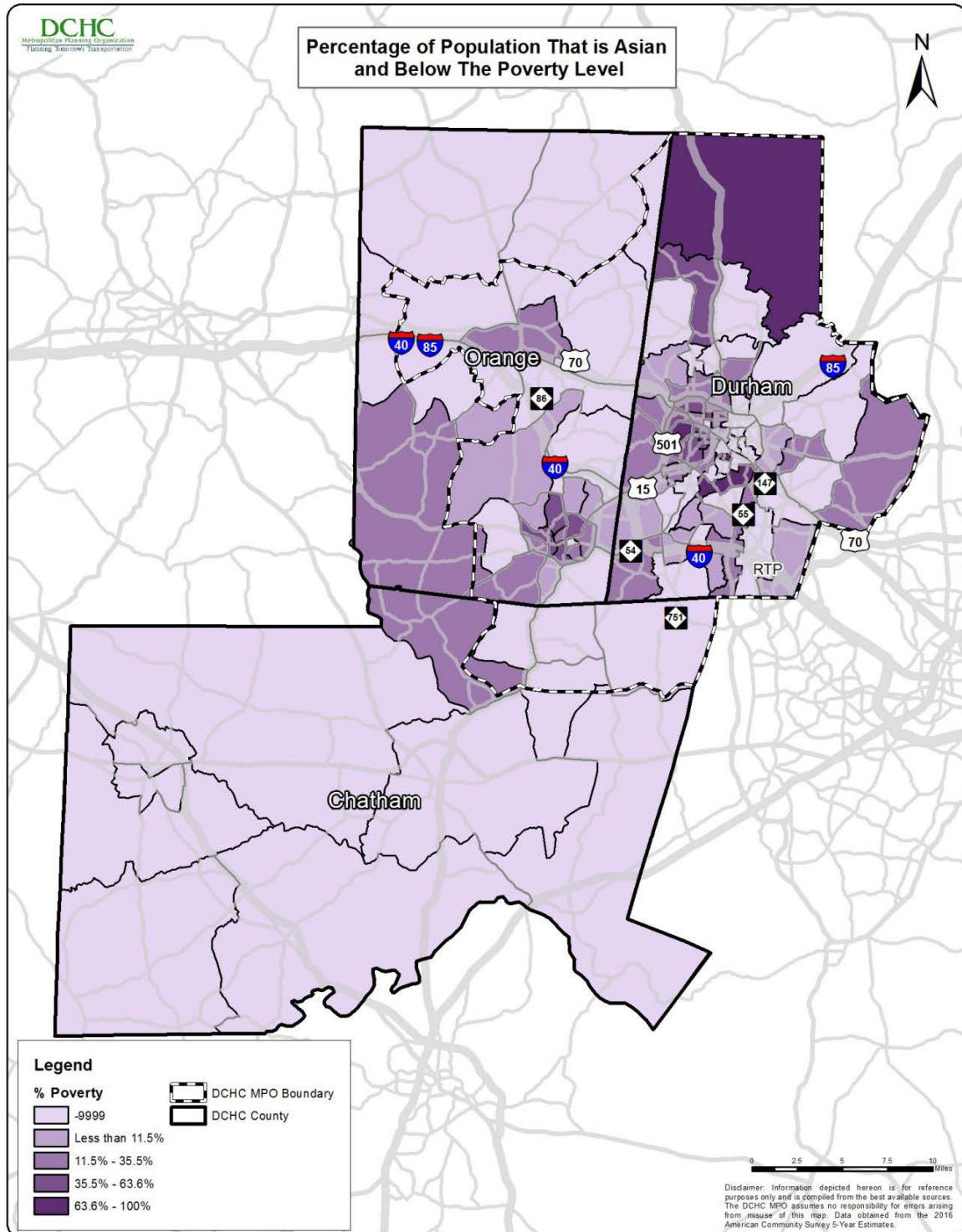
White



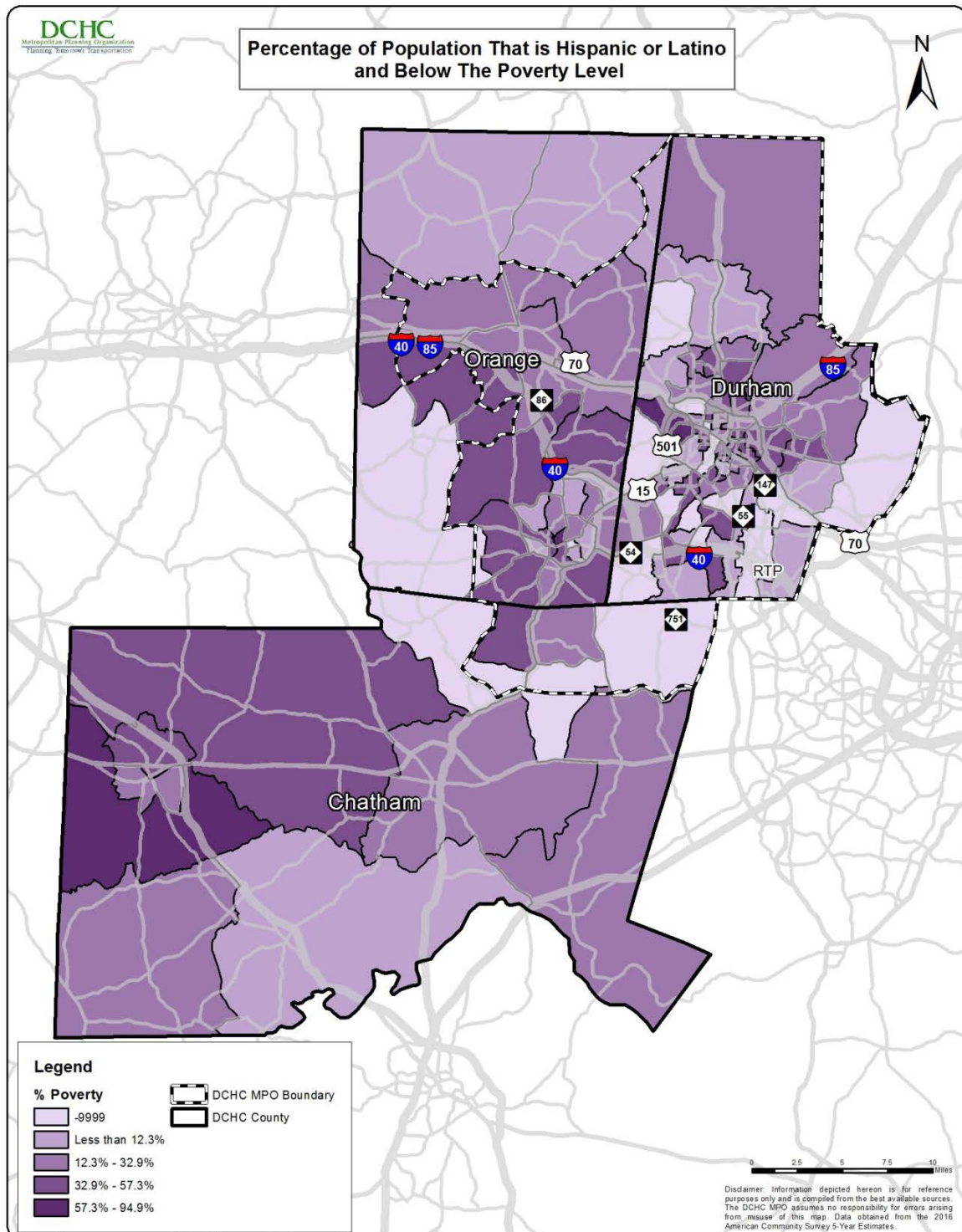
Black



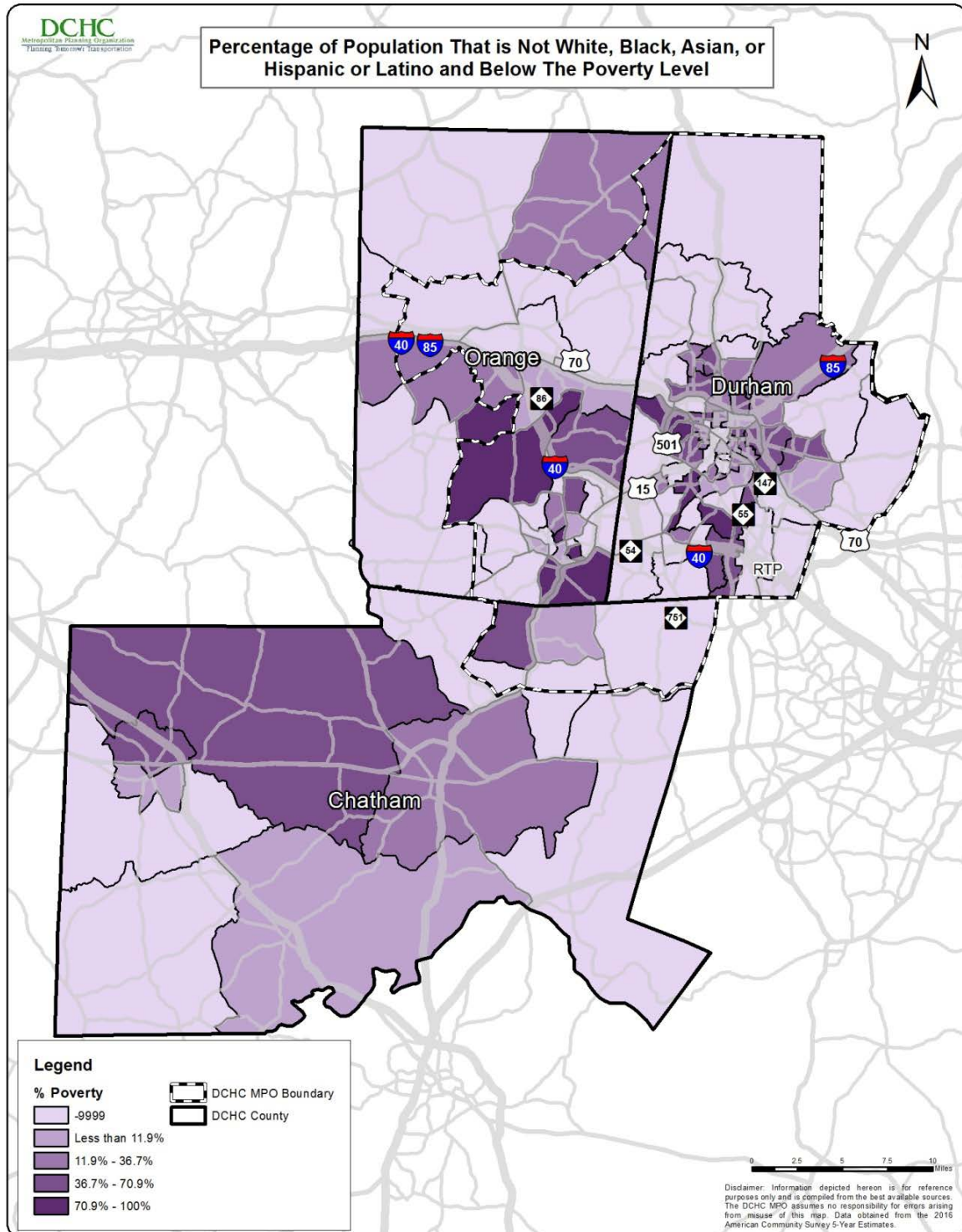
Asian



Hispanic or Latino

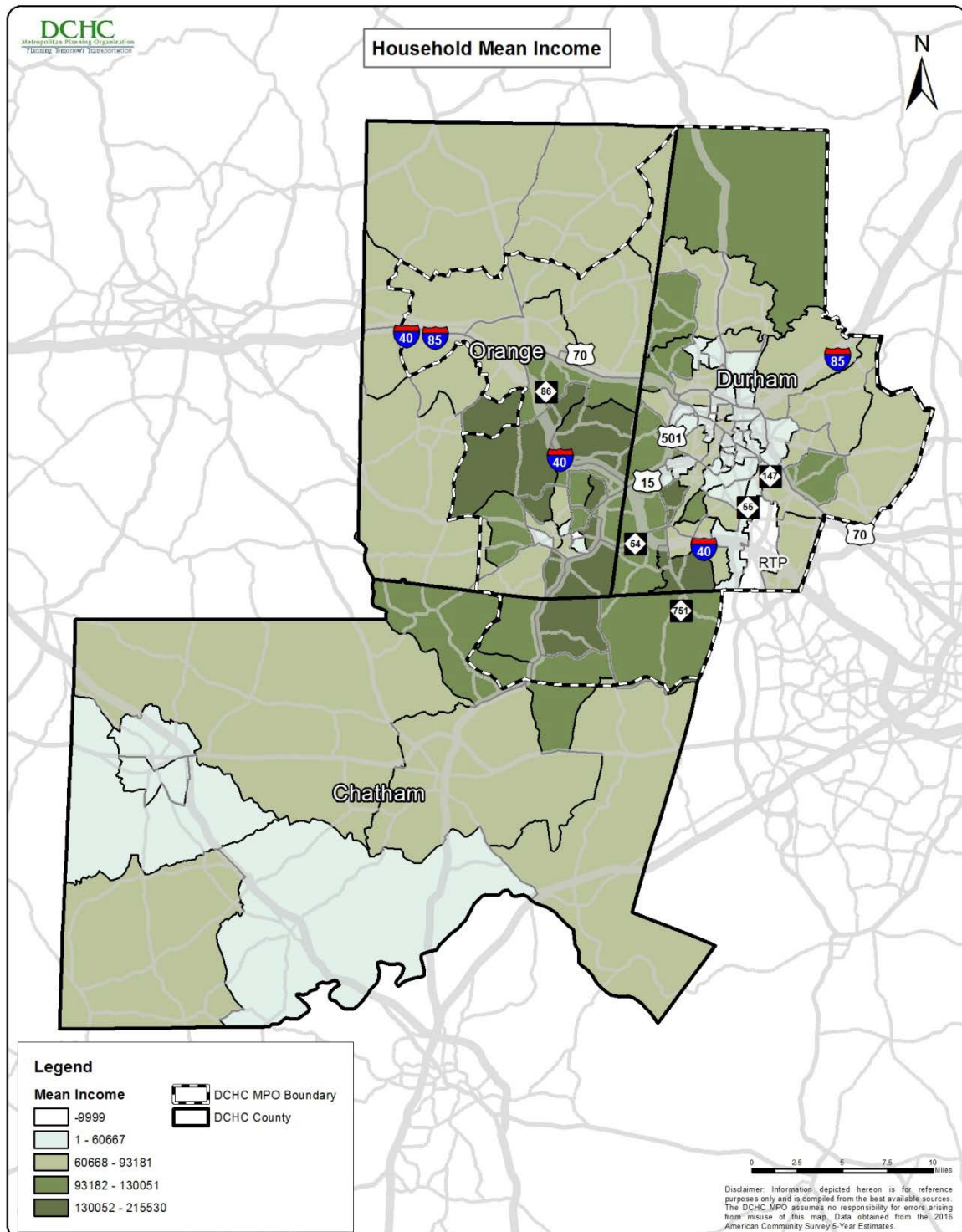


Other Race

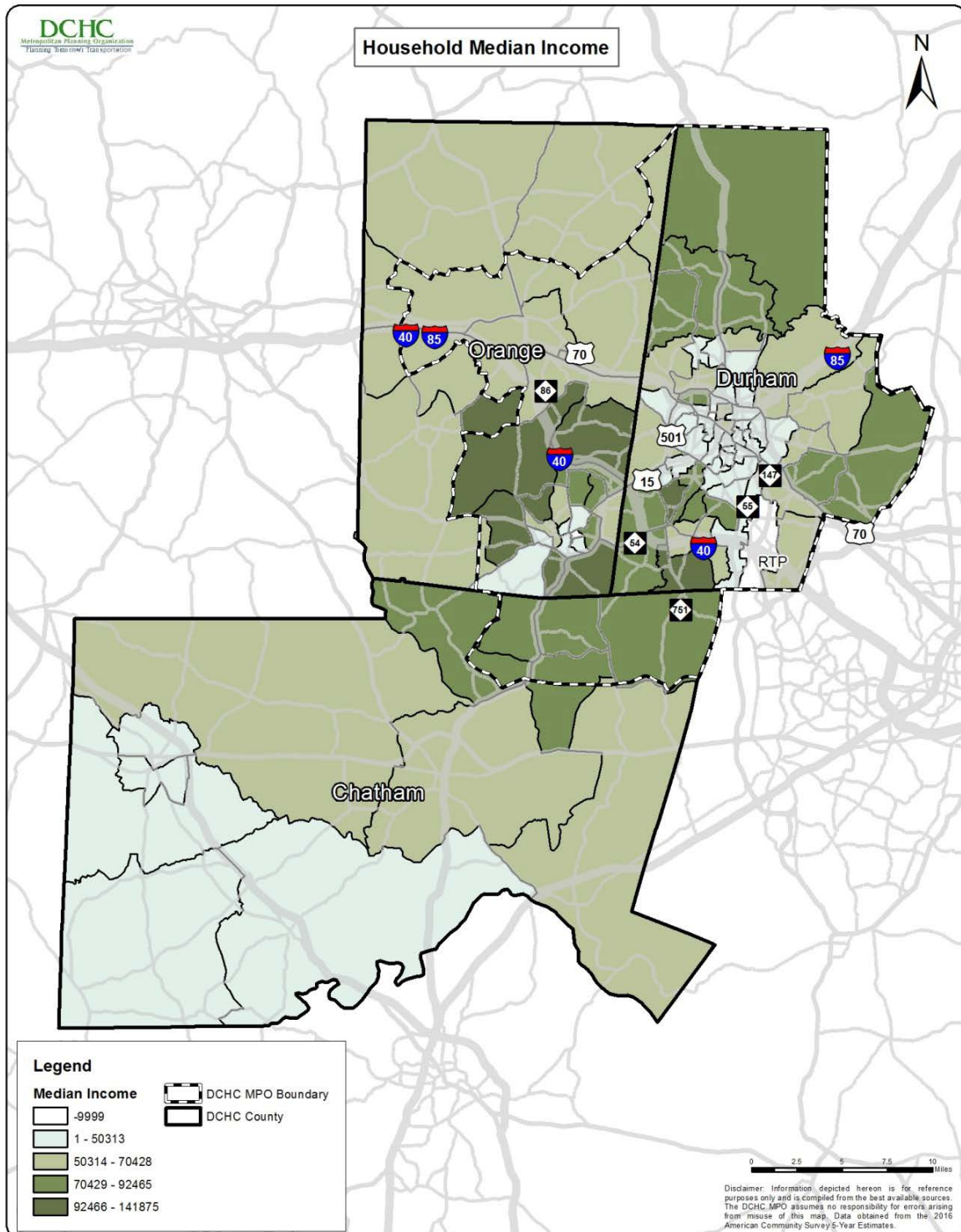


Household Income
The following maps display characteristics of household income.

Mean Income



Median Income



APPENDIX I

Investigation Guidance, Discrimination Complaint Form and Log

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 (i.e., Title VI Coordinator or other official trained to conduct Title VI investigations) 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, if applicable)
 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 – e.g., Complainant alleges his predominantly African American community was excluded from a meeting concerning a future project which could affect the community.
 - b. Documents needed – e.g., mailing list which shows all physical addresses, P.O. Box numbers, property owner names, and dates when the meeting notification was mailed; other methods used to advertise the meeting.
- 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. Preparing 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 allegation. A sample outline for an investigative report is provided below.

Sample Investigative Report Template

VI. COMPLAINANT(S) NAME (or attorney for the complainant(s) – name and address if applicable Name, Address, Phone: 999-999-9999

VII. RESPONDENT(S) (or attorney for the respondent(s) – name and address if applicable) Name, Address, Phone: 999-999-9999

VIII. 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)]

IX. COMPLAINT BASIS/(ES) [For example, Race, Color, National Origin, Limited English Proficiency, Sex, Age, Disability)]

X. ALLEGATIONS [Describe in logical sequence, each allegation including the prohibited basis for the alleged discriminatory conduct, (e.g., race, color, national origin, sex, 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.

XI. 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.]

XII. 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.]

XIII. 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.]

XIV. 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.]

XV. 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.]



Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (DCHC MPO)

DISCRIMINATION COMPLAINT FORM

Any person who believes that he/she has been subjected to discrimination based upon race, color, national origin, sex, age, or disability may file a written complaint with DCHC MPO, 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: <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> AGE <input type="checkbox"/> SEX <input type="checkbox"/> DISABILITY <input type="checkbox"/> LIMITED ENGLISH PROFICIENCY			
Identify the Race of the Complainant <input type="checkbox"/> Black <input type="checkbox"/> White <input type="checkbox"/> Hispanic <input type="checkbox"/> Asian American <input type="checkbox"/> American Indian <input type="checkbox"/> Alaskan Native <input type="checkbox"/> Pacific Islander <input type="checkbox"/> 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).			
<i>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.</i>			
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).			
Name Address Telephone 1. 2. 3. 4.			

DISCRIMINATION COMPLAINT FORM

<p>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.</p> <p> <input type="checkbox"/> NC Department of Transportation _____ <input type="checkbox"/> Federal Highway Administration _____ <input type="checkbox"/> US Department of Transportation _____ <input type="checkbox"/> Federal or State Court _____ <input type="checkbox"/> Other _____ </p>	
<p>Have you discussed the complaint with any DCHC MPO representative? If yes, provide the name, position, and date of discussion.</p> 	
<p>Please provide any additional information that you believe would assist with an investigation.</p> 	
<p>Briefly explain what remedy, or action, are you seeking for the alleged discrimination.</p> 	
<p>**WE CANNOT ACCEPT AN UNSIGNED COMPLAINT. PLEASE SIGN AND DATE THE COMPLAINT FORM BELOW.</p>	
<p><i>COMPLAINANT'S SIGNATURE</i></p>	<p><i>DATE</i></p>
<p>MAIL COMPLAINT FORM TO: Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (DCHC MPO) 101 City Hall Plaza -4th Floor Transportation CITY, NC 27701 919-560-4366 exr. 36424</p>	
<p style="text-align: center;">FOR OFFICE USE ONLY</p> <p> Date Complaint Received: _____ Processed by: _____ Case #: _____ Referred to: 0NCDOT 0FHWA Date Referred: _____ </p>	

Log Year(s): _____

[illegible]

I certify that to the best of my knowledge, the above described complaints or lawsuits alleging discrimination, or no complaints or lawsuits alleging discrimination, have been filed with or against Durham-Chapel Hill-Carrboro Metropolitan Planning Organization (DCHC MPO) since the previous Title VI Program submission to NCDOT.

Date _____

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APPENDIX J
Compliance Review Checklist for FHWA Subrecipients

General Requirements	Completed
<i>1. A copy of the recipient's signed USDOT Title VI Assurances</i>	
<i>2. Title VI Policy Statement (signed)</i>	
<i>3. Title VI Notice to Public, including a list of locations where the notice is posted</i>	
<i>4. Name and official title of Title VI Coordinator and a list of their Title VI duties</i>	
<i>5. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)</i>	
<i>6. Title VI Complaint Form</i>	
<i>7. List of Title VI complaints, investigations, or lawsuits (i.e., Title VI Complaint Log)</i>	
<i>8. Public Participation Plan, including information about outreach methods to engage traditionally underserved constituencies (e.g., minorities, low-income, disabled), as well as a summary of outreach efforts</i>	
<i>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</i>	
<i>10. A table depicting the membership of any non-elected committees and councils, broken down by race and gender, and a description of the process the MPO uses to encourage minorities and women to participate on such committees</i>	
<i>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 reviewed and approved the Title VI Program</i>	
<i>12. Compliance and enforcement procedures to ensure nondiscriminatory administration of programs and services</i>	
<i>13. A demographic profile of your planning area that includes identification of the locations of minority, low-income, LEP, and/or other underserved populations</i>	
<i>14. Information regarding how consultants and/or subrecipients are monitored for compliance with Title VI</i>	
<i>15. Any environmental justice analysis conducted in the past three years and, if necessary, a description of the measures used to address any disproportionately high and adverse impacts to minority or low-income communities</i>	
<i>16. Documentation from any Title VI compliance reviews or investigations conducted by any agency other than NCDOT-OCR in the last three years</i>	