
TITLE VI & LIMITED ENGLISH PROFICIENCY (LEP) ASSISTANCE PLAN

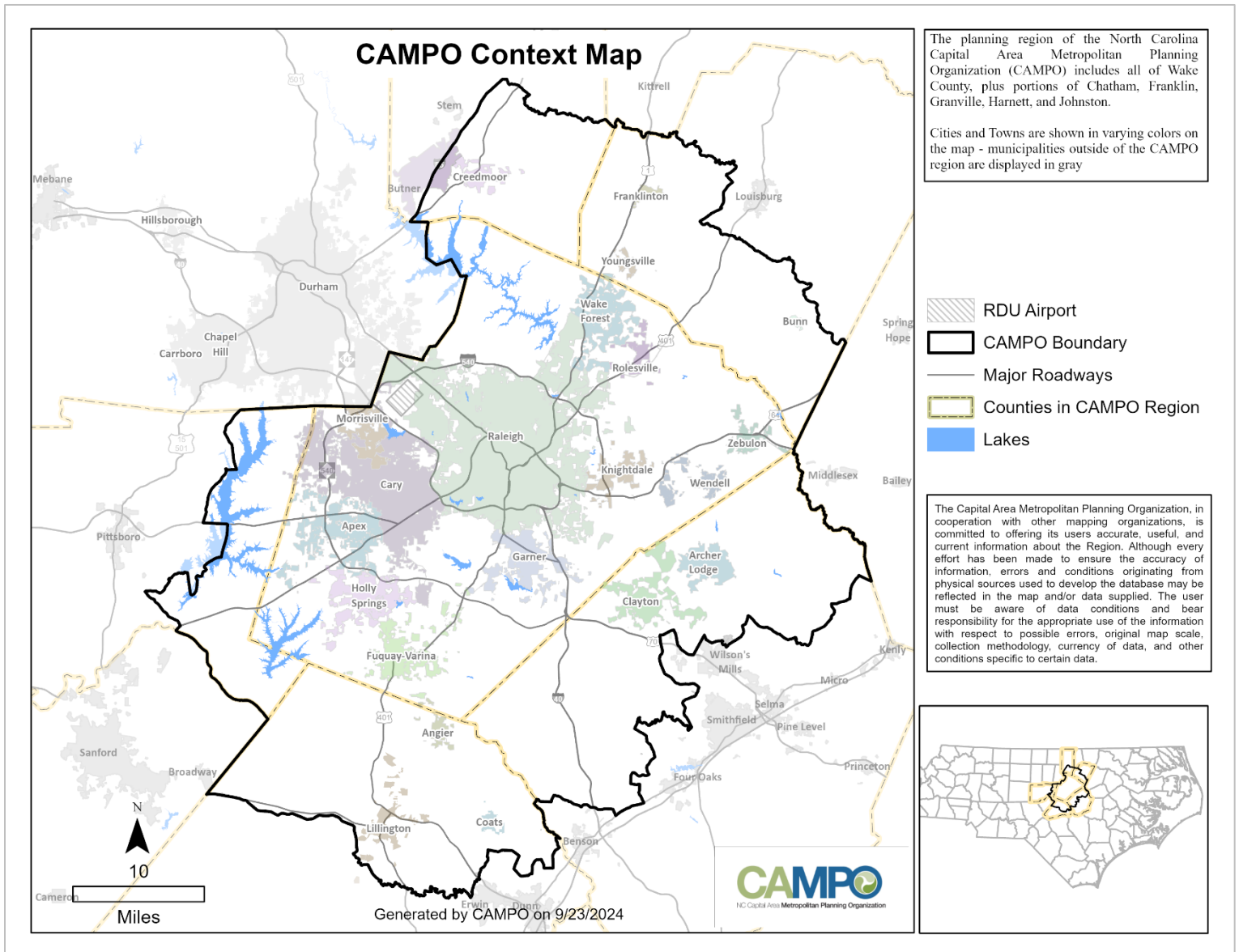


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CAMPO SERVICE AREA



TITLE VI POLICY STATEMENT AND NOTICE OF NONDISCRIMINATION

It is the policy of the Capital Area Metropolitan Planning Organization (CAMPO) 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 CAMPO programs and activities, as provided by Title VI of the Civil Rights Act of 1964, 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 CAMPO's Title VI Coordinator.

Bonnie Parker
1 Fenton Main Street, Suite 201
Cary, NC 27511
(984) 542-3604
Bonnie.Parker@campo-nc.us

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

Chris Lukasina, Executive Director
XXX XX, 2024

Implementation (Dissemination)

- The above 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 Executive Director of the Capital Area Metropolitan Planning Organization, and re-signed whenever a new person assumes that position.
- The signed statement will be posted in the office lobby, in the Board Room, and at MPO hosted public meetings whenever possible.
- The signed statement will be included in all written agreements.
- When CAMPO distributes federal funds to another government or enters into a contractual agreement with another organization, the statement will be included.
- The statement will be incorporated into Title VI training and acknowledgement 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

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

ORGANIZATION & STAFFING

A Metropolitan Planning Organization (MPO) is 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](#) (TIP) 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 for MPOs in TMAs also must be certified by the Secretary of DOT as being in compliance with federal requirements.

The Capital Area MPO grew from a collaborative effort between Cary, Raleigh, Garner, and Wake County into an organization that currently includes all of Wake County, as well as parts of Chatham, Franklin, Granville, Harnett, and Johnston Counties. This includes the municipalities of: Angier, Apex, Archer Lodge, Cary, Clayton, Coats, Creedmoor, Franklinton, Fuquay-Varina, Garner, Holly Springs, Knightdale, Lillington, Morrisville, Rolesville, Wake Forest, Wendell, Youngsville, and Zebulon. The Capital Area MPO serves as the coordinating agency between local governments, the N.C. Department of Transportation (NCDOT), the Federal Transit Administration (FTA), and the Federal Highways Administration (FHWA) within the U.S. Department of Transportation. Staff has established a close working relationship with the planning departments of municipalities within the MPO as well as with the planning staff of the neighboring [Durham-Chapel Hill-Carrboro \(DCHC\) MPO](#).

CAMPO is comprised of three divisions of authority: the [Executive Board](#) (formerly the Transportation Advisory Committee (TAC)), a [Technical Coordinating Committee](#) (TCC), and the [staff](#). The MPO is responsible for carrying out an annual work program that is approved by the Executive Board. The MPO also must update the MPO's [Transportation Improvement Program](#) (a 10-year project programming schedule) and the [Metropolitan Transportation Plan](#) (a minimum 20-year forecast of projects and programs).

The Executive Board is the decision-making body of the MPO, comprised of elected officials from member governments, as well as stakeholders from other agencies totaling thirty members. The Executive Board typically meets monthly at 4:00 p.m. on the third Wednesday of each month, unless otherwise listed on the [Calendar](#).

The Technical Coordinating Committee (TCC) is comprised of staff from member and stakeholder agencies. The TCC provides technical recommendations to the CAMPO Executive Board. TCC meetings are held on the first Thursday of each month at the CAMPO offices at 10:00 a.m., unless otherwise listed on the [Calendar](#).

TITLE VI COORDINATOR

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 (training) internal staff and officials are familiar and complying with their Title VI training obligations as outlined in the Public Participation Plan. Keep a log of staff training for Title VI.
- 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 traditionally disadvantaged populations are included and not discriminated against.
- Ensuring that non-elected boards and committees reflect the service area and environmental justice populations are represented.

- Promptly processing (receiving, logging, investigating and/or forwarding) discrimination complaints.
- Providing information to NCDOT, FHWA and FTA 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 Executive Director.

STAFFING

CAMPO currently employs a staff of 24, which consists of the following job categories:

- Executive Director
- Deputy Directors (2)
- Finance Director/Operations Manager
- LAPP Manager
- Wake Transit Program Manager
- GIS Manager
- Fiscal Analyst
- Public Engagement Planner/Title VI Coordinator
- Office Manager/Admin. Assist.
- Senior Transportation Planner (6)
- Transportation Planners (1)
- Data Scientist/Modeler (2)
- GIS Technician
- Senior Wake Transit Planner
- Wake Transit Planner
- TPAC Administrator
- Regional Mobility Manager

An organizational chart showing the Public Engagement Planner/Title VI Coordinator's place within the organization is located in Appendix C.

TITLE VI: MINORITY AND LOW-INCOME POPULATIONS (MLI)

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

– Title VI, Civil Rights Act of 1964

This law is the basis for metropolitan planning organizations (MPOs) to verify that their programs are not creating a “disproportionate burden” on any one group. MPOs also check to see that the benefits of their programs are equitably distributed.

In addition to the 1964 Civil Rights Act, the following are also considered part of the MPO checks for non-discrimination and fairness:

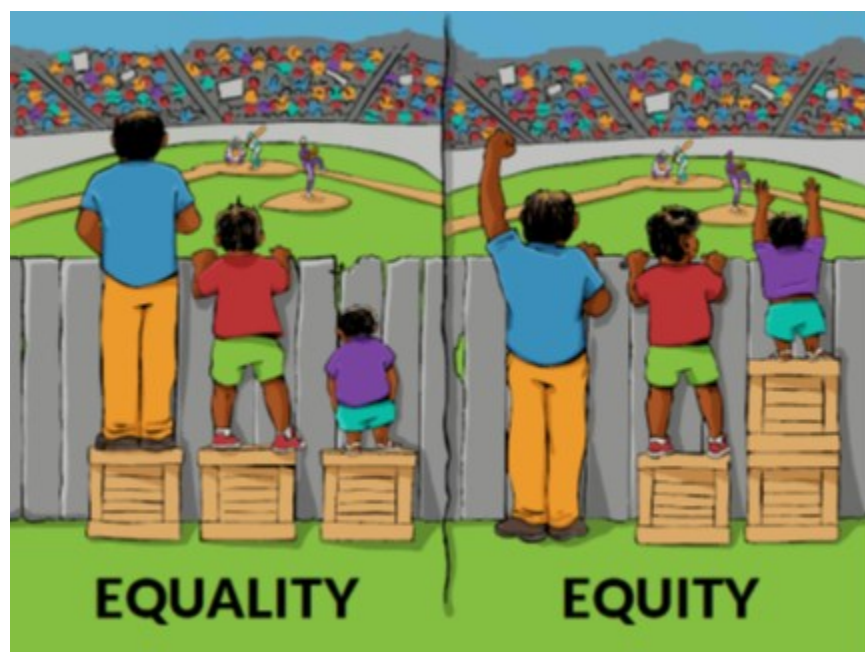
- Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (gender),
- Older Americans Act (1965) and Age Discrimination Act of 1975 (age), and
- Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act of 1990 (disability)
- Executive Order 12898 (1994), Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. (minority, low-income)
- Executive Order 13166 (2000), assures non-discrimination based on limited proficiency in speaking, reading, or writing English (limited English)
- Executive Order 14096 (2023), establishing new environmental justice initiatives, focusing on transportation disadvantaged populations (minority, age, low-income)

Taken together, these requirements define an over-arching Title VI/Nondiscrimination Program. Although Environmental Justice (EJ), Title VI Non-Discrimination, and Equity are distinct elements, collectively they can contribute to the development of an equitable transportation system. These elements are regularly mistaken and used interchangeably, thus, making it essential to understand their differences.

Environmental Justice focuses on identifying and addressing disproportionately high and adverse human health or environmental effects of an agency's programs, policies, and activities on minority populations and low-income populations to achieve an equitable distribution of benefits and burdens. This objective is to be achieved, in part, by actively adhering to the principles and practices of both Title VI and the National Environmental Policy Act (NEPA) during the development and implementation of transportation activities. **The classes covered by EJ vary slightly from those covered by Title VI and other nondiscrimination statutes.**

Title VI prohibits discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance. "Nondiscrimination" is more inclusive than the Title VI statute as it covers additional classes of individuals and pertains to other civil rights authorities with which funding recipients must comply. Under the Title VI statute, protected classes include race, color, and national origin; **limited English proficiency** is included within the class of national origin. USDOT's (through the Federal Highways Administration (FHWA) and Federal Transit Administration (FTA)) Title VI program (in contrast to the Title VI *statute*) **expands the covered classes to include sex, age, disability and low-income.**

Equity in transportation seeks fairness in mobility and accessibility to meet the needs of all community members. This population group includes individuals in at least one of the following categories: Low Income, Minority, Elderly, Children, Limited English Proficiency, or Persons with Disabilities. It is important to note that transportation equity does not mean equal. An equitable transportation plan considers the circumstances impacting a community's mobility and connectivity needs and this information is used to determine the measures needed to develop an equitable transportation network. The graphic below illustrates the differences between equality and equity. To attain an equitable transportation network, all components of Title VI, EJ, and Nondiscrimination must be considered.



ENVIRONMENTAL JUSTICE (EJ)/COMMUNITIES OF CONCERN

CAMPO will identify each protected class and then show how they overlap geographically, specifying where there is a combination of the highest concentrations and largest number of protected class overlaps. These areas will be called “Communities of Concern” (CofC) and will be used to target engagement activities and evaluate the relative benefit/burden of transportation investments in the region in the Metropolitan Transportation Plan (MTP) or Transportation Improvement Program (TIP).

In 1994, President 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 Capital Area 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.

In 2023, as part of President Joseph Biden’s Executive Order 14096 extending and enhancing Environmental Justice efforts, increased emphasis has been placed on meaningful engagement, as well as focusing transportation investments on areas with populations and communities geographically identified as “transportation disadvantaged”. This has largely been an effort to use census and other demographic data to identify concentrations of EJ populations. The Capital Area MPO does this through the identification of “Communities of Concern.”

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. To achieve EJ, CAMPO's programs will be administered to identify target populations, conduct meaningful engagement, 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 benefits and opportunities to enhance communities, neighborhoods, and individuals affected by CAMPO 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;
- 4) Eliciting meaningful public engagement opportunities and considering the results thereof, including soliciting input from affected transportation-disadvantaged populations in considering alternatives before making a final decision;
- 5) Collecting demographic data to document public engagement in the decision-making process; and,
- 6) Adding an EJ section to MPO plans and studies including demographic data, public engagement plans, and public engagement summaries, such as the Metropolitan Transportation Plan, Public Participation Plans, and non-technical Special Studies.

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.



The following are representative of the types of public engagement techniques CAMPO uses:

- ✓ Provide ample opportunity through effective public notices and outreach activities to engage specific segments of the population or their respective representation in the early planning phases of a project;
- ✓ Provide access to information through clear, consistent, simple language across communication vehicles both digital and in-person, passive (i.e. flyers at bus stops) and direct (i.e. info card handed to a person; presentation to a group);
- ✓ Identify concentrations of traditionally disadvantaged populations by mapping demographic data;
- ✓ Incorporate environmental justice considerations into the Metropolitan Transportation Plan (MTP) and Transportation Improvement Plan (TIP) criteria to ensure these issues are addressed in the early phases of the planning process;
- ✓ Utilize geographical information systems (GIS) to map transportation investments in relation to concentrations of traditionally disadvantaged populations with an intent to identify, highlight and analyze projects within these areas; respective to the Metropolitan Transportation Plan (MTP) or Transportation Improvement Program (TIP);
- ✓ Utilize the “Community Based Organizations Contact List” to identify all interest groups and relevant agencies with the intent to foster relationships and establish direct contact for feedback on federally funded transportation projects/programs from these parties; and,
- ✓ Investigate the impacts of transportation projects on these populations and work with interest groups and/or local representatives to explore alternatives.



1 – CAMPO staff conducting outreach for a corridor study at Fuquay-Varina Meat Market, 2022

As part of EJ, the **methodology on the following pages is used by the Capital Area MPO for identifying Communities of Concern.**

DATA COLLECTION/ANALYSIS/REPORTING

Data collection, analysis and reporting are key elements of a successful Title VI strategy. To ensure that Title VI reporting requirements are met, the Capital Area 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 demographic tables/maps on race, ethnicity, age, sex, disability, households without cars, poverty, and household income.

POPULATION LOCATIONS

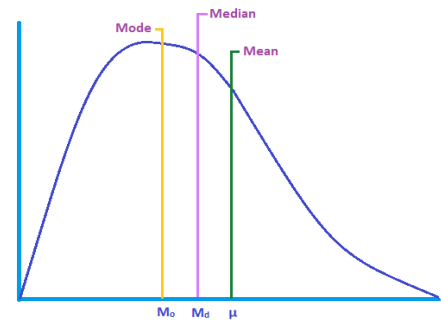
Recipients of federal funds are required to identify the characteristics and locations of populations they serve, particularly by race/ethnicity, age, sex, low-income and limited English proficiency. We will document this narratively or through maps that overlay boundaries and demographic features on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

The Capital Area MPO uses US Census Block Group-level data from the American Community Survey to look for concentrations of protected classes. These “communities of concern” (CofCs) represent where the greatest likelihood of encountering these populations exists geographically. This is not the only way the MPO will identify those populations, but for regional-scale efforts this allows the MPO to use outreach resources most effectively. Local planning efforts will require more in-depth research, including site visits, local planners’ knowledge, language assistance resource contacts, and street-view inventories.

REGIONAL DEMOGRAPHIC PROFILES

There are three statistical tools to note for all the protected classes we evaluated:

- 1) Use of Census Block Groups in the CAMPO region as the geographic unit is used because they are updated each year, and some data are only available at this scale. It also helps to compare urban, suburban, and rural areas in a similar way.¹
- 2) Choice of which “average” we use. By choosing to use the “median” as our measure, it gets around any extremes that may exist within the block group. By using a median, the primary makeup of the block group is reflected because extremes will not have as much impact.
- 3) Measuring each item evaluated as a percentage. This also helps to create a similar comparison for urban, suburban, and rural parts of the region.

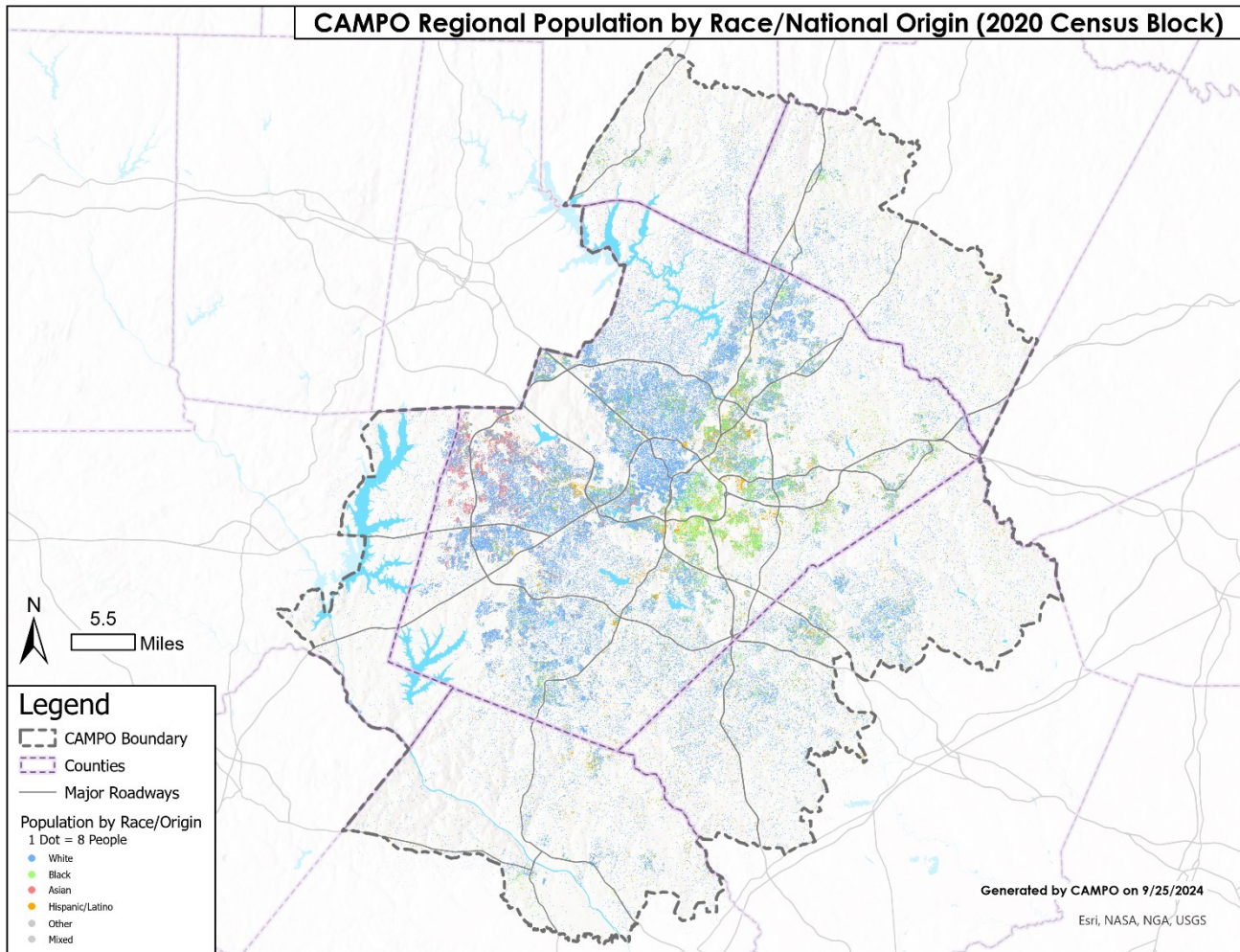


Percentiles are just like the median “average” measure; the difference is instead of using the halfway point (50%), a percentile can be adjusted. If you just want the top 25% of whatever you are measuring, you set the percentile to 75. If you wanted the top 10%, you set the percentile to 90, et cetera. CAMPO has **759** block groups, so each measure will take the highest **190** block groups (top 25%).

¹ The way block groups are drawn, it helps to “spatially normalize” the data.

Demographic Profiles: Race, Color, & National Origin

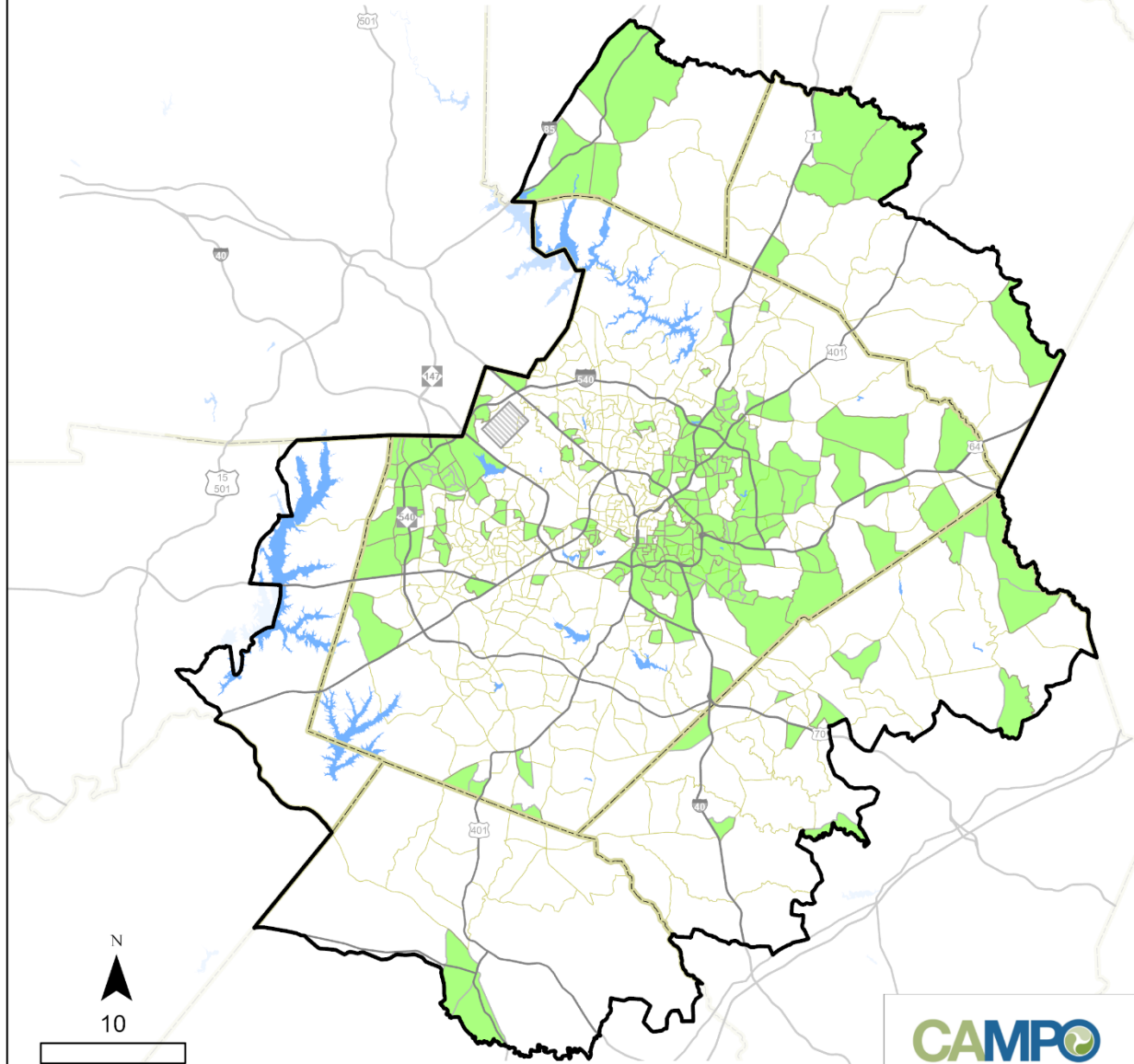
Under the Title VI Program populations, CAMPO first looked at Race, Color, and National Origin. Initially, we looked at rolling all the components of these classes into a single measure. The nature of our region made it more effective to measure the most prevalent groups separately. Since the Census does not gather data on “Color” separately, we use Race to stand for both Race and Color.



CAMPO used the following measures for Race and National Origin:

1. Non-white race: it includes all race categories that are not white in the census. The two most prevalent in the region are black and Asian. The cutoff for inclusion is at least 51.92% of the people in a block group identifying as non-white.
2. Hispanic/Latino Origin: if a block group is 14.92% Hispanic/Latino or above, it is included as a Community of Concern (CofC). Note that someone can be a white race, black race, or any race category and still identify as having Hispanic or Latino origin. For that reason, it is treated separately from race.

Top 25% of Non-White Race Census Block Groups



Generated by CAMPO on 9/23/2024



This map shows where concentrations of populations of non-white race exist in the region at or above the 48.56% threshold for CAMPO. The threshold represents block groups where at least 48.51% of the people living there identify as a non-white race for the Census.

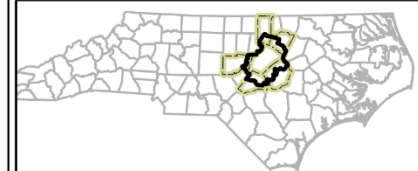
For CAMPO, 48.56% is the cutoff to be in the highest ranking 189 block groups in the region--the top 25% out of 759 total block groups. Any block groups with zero populations are then removed (ex. RDU Airport).

Note that Hispanic/Latino origin is treated separately from race.

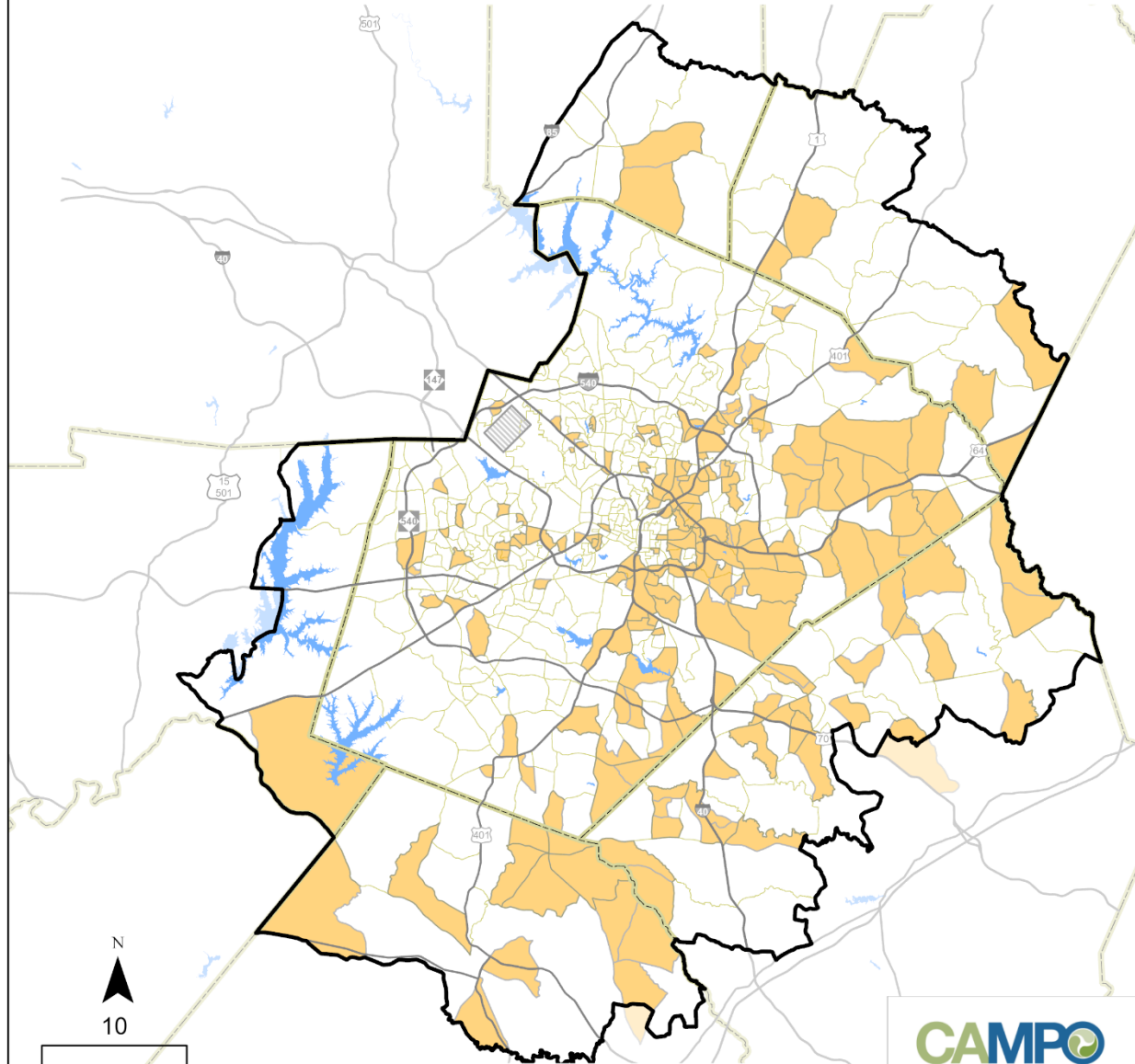
Source Data: 2018-2022 5-Year ACS

- RDU Airport
- CAMPO Boundary
- Major Roadways
- Counties in CAMPO Region
- Lakes
- Minority Non-White
- Other Block Groups

The Capital Area Metropolitan Planning Organization, in cooperation with other mapping organizations, is committed to offering its users accurate, useful, and current information about the Region. Although every effort has been made to ensure the accuracy of information, errors and conditions originating from physical sources used to develop the database may be reflected in the map and/or data supplied. The user must be aware of data conditions and bear responsibility for the appropriate use of the information with respect to possible errors, original map scale, collection methodology, currency of data, and other conditions specific to certain data.



Top 25% of Hispanic/Latino Origin Census Block Groups



Generated by CAMPO on 9/23/2024



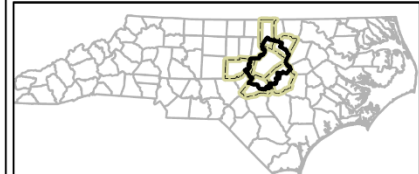
This map shows where concentrations of populations of Hispanic/Latino origin exist in the region at or above the 14.57% threshold for CAMPO. The threshold represents block groups where 14.57% of the people reported ancestry from Spain and Latin American Spanish-speaking countries.

For CAMPO, 14.57% is the cutoff to be in the highest ranking 189 block groups in the region--the top 25% out of 759 total block groups. Any block groups with zero populations are then removed (ex. RDU Airport).

Source Data: 2018-2022 5-Year ACS

- RDU Airport
- CAMPO Boundary
- Major Roadways
- Counties in CAMPO Region
- Lakes
- Other Block Groups
- Hispanic/Latino

The Capital Area Metropolitan Planning Organization, in cooperation with other mapping organizations, is committed to offering its users accurate, useful, and current information about the Region. Although every effort has been made to ensure the accuracy of information, errors and conditions originating from physical sources used to develop the database may be reflected in the map and/or data supplied. The user must be aware of data conditions and bear responsibility for the appropriate use of the information with respect to possible errors, original map scale, collection methodology, currency of data, and other conditions specific to certain data.



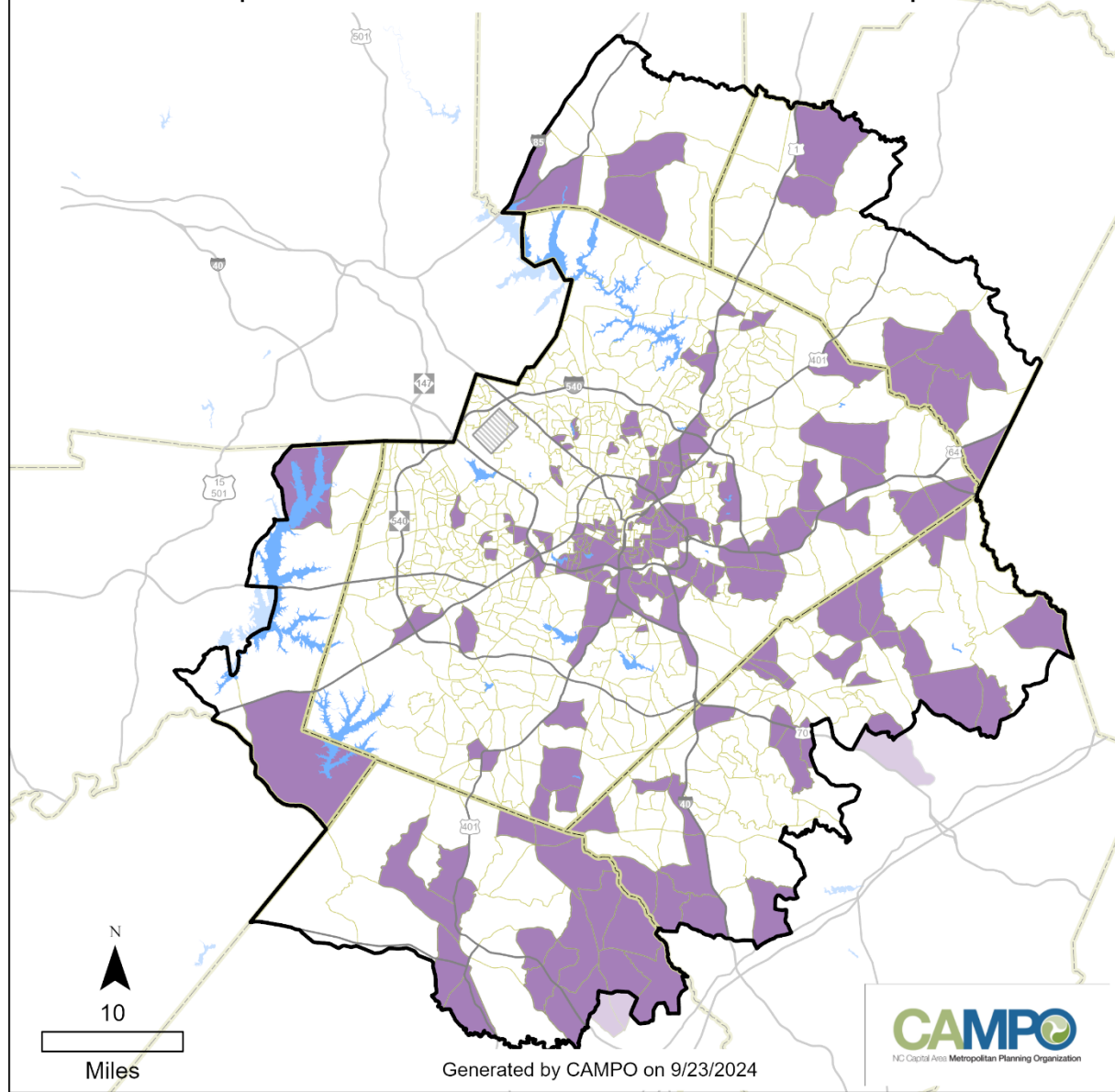
DEMOGRAPHIC PROFILES: LOW-INCOME

Under the Title VI Program Coverage umbrella, CAMPO considers low-income as a measure to use for CofC's based on Executive Order 12898 and subsequent Federal guidance.

Poverty is calculated by the US Bureau of the Census based on a set of rules created in the 1960's by the Department of Agriculture. "Below the poverty line" is actually a sliding scale for different age groups and family sizes. Our data were normalized so that all of the people in a block group could be compared equally.

We defined low-income as a combination of those below the federal poverty line and those near the poverty line (below 150% of the poverty line). If 24.08% of a block group meets the criterion, that block group is included as a CofC for regional outreach and analysis based on the 75th percentile.

Top 25% of Low Income Census Block Groups



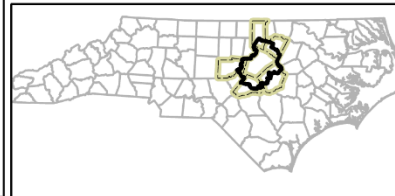
Since so many people are one paycheck away from being a poverty statistic, we defined low income as a combination of those below the federal poverty line and those near the poverty line. "Near" the poverty line are those with an income below 150% of the poverty line.

This map shows where concentrations of populations of low income individuals exist in the region at or above the 21.83% threshold for CAMPO. The threshold represents the top 25% of block groups for the percent of the population living there that meet the low income criteria.

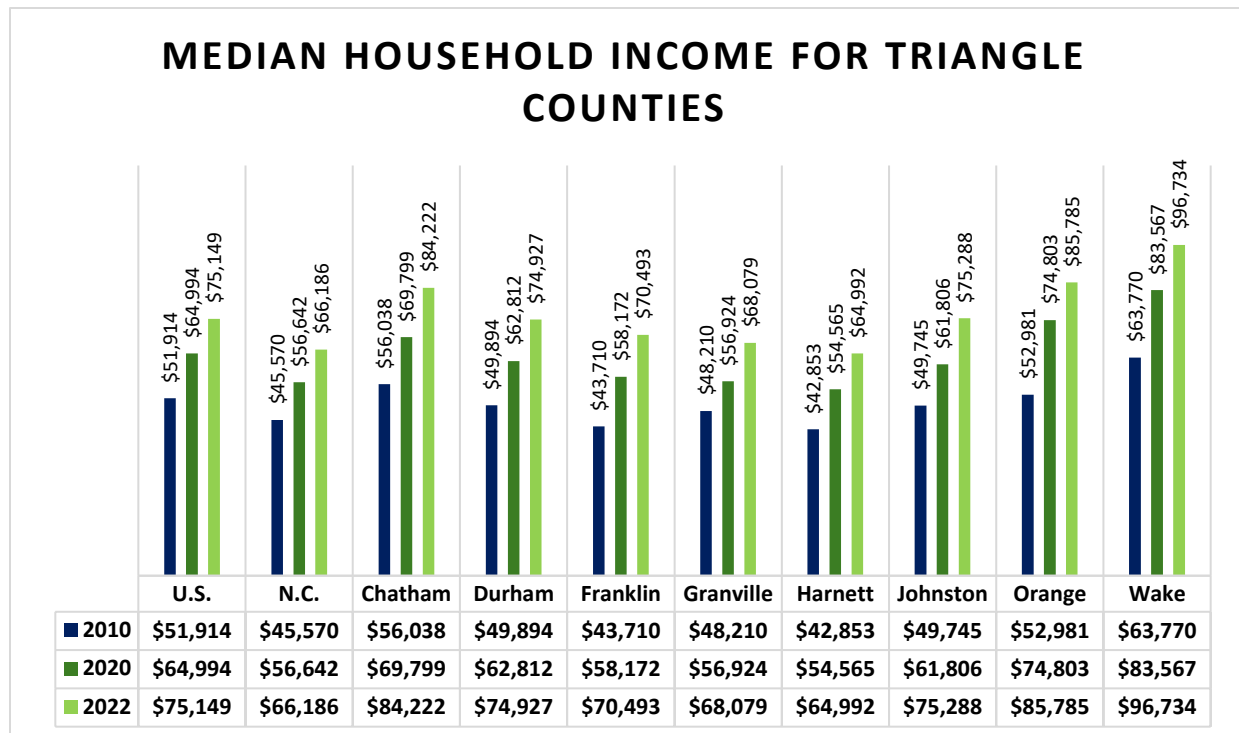
Source Data: 2018-2022 5-Year ACS

- RDU Airport
- Major Roadways
- Counties in CAMPO Region
- Lakes
- Other Block Groups
- Below 150% of Poverty Line
- CAMPO Boundary

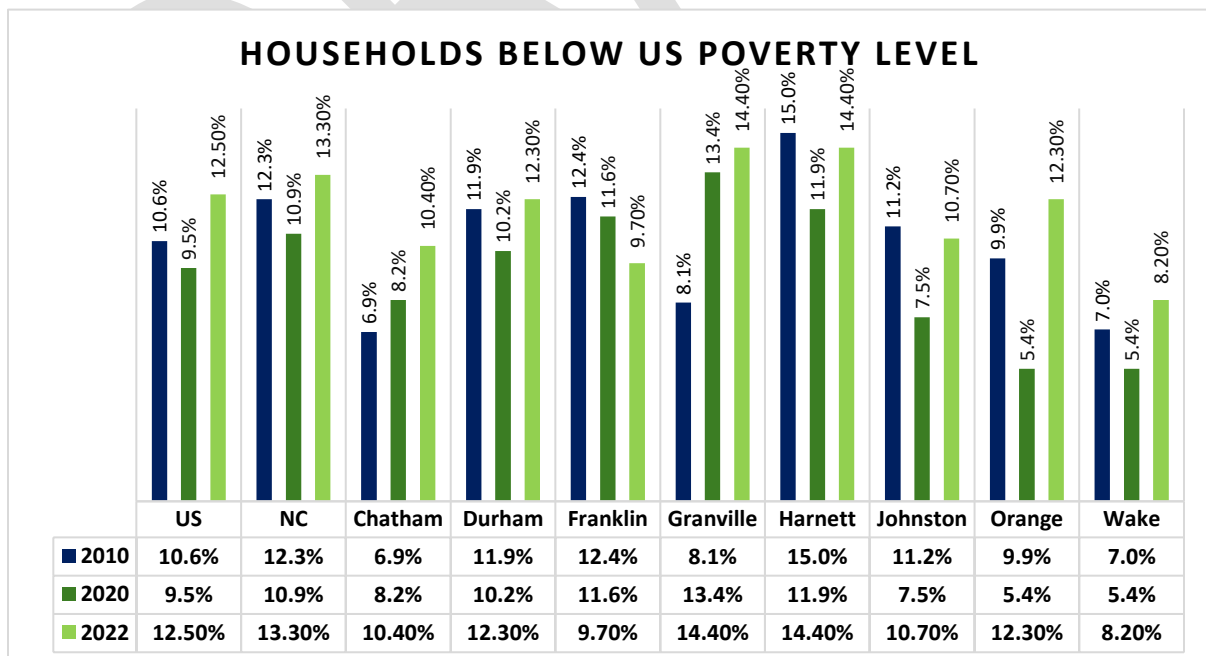
The Capital Area Metropolitan Planning Organization, in cooperation with other mapping organizations, is committed to offering its users accurate, useful, and current information about the Region. Although every effort has been made to ensure the accuracy of information, errors and conditions originating from physical sources used to develop the database may be reflected in the map and/or data supplied. The user must be aware of data conditions and bear responsibility for the appropriate use of the information with respect to possible errors, original map scale, collection methodology, currency of data, and other conditions specific to certain data.



As general background, the U.S. **median household income** for 2010 was \$51,914 and by 2022 it increased to \$75,149. The median household income for the two MPO regions' counties also increased as shown below:



The official **poverty** threshold depends on family size. For a family of four, the national 2024 poverty line is an income of \$31,200 per year. Using that figure, within the MPO area, the following percentages of persons fell below the poverty level:



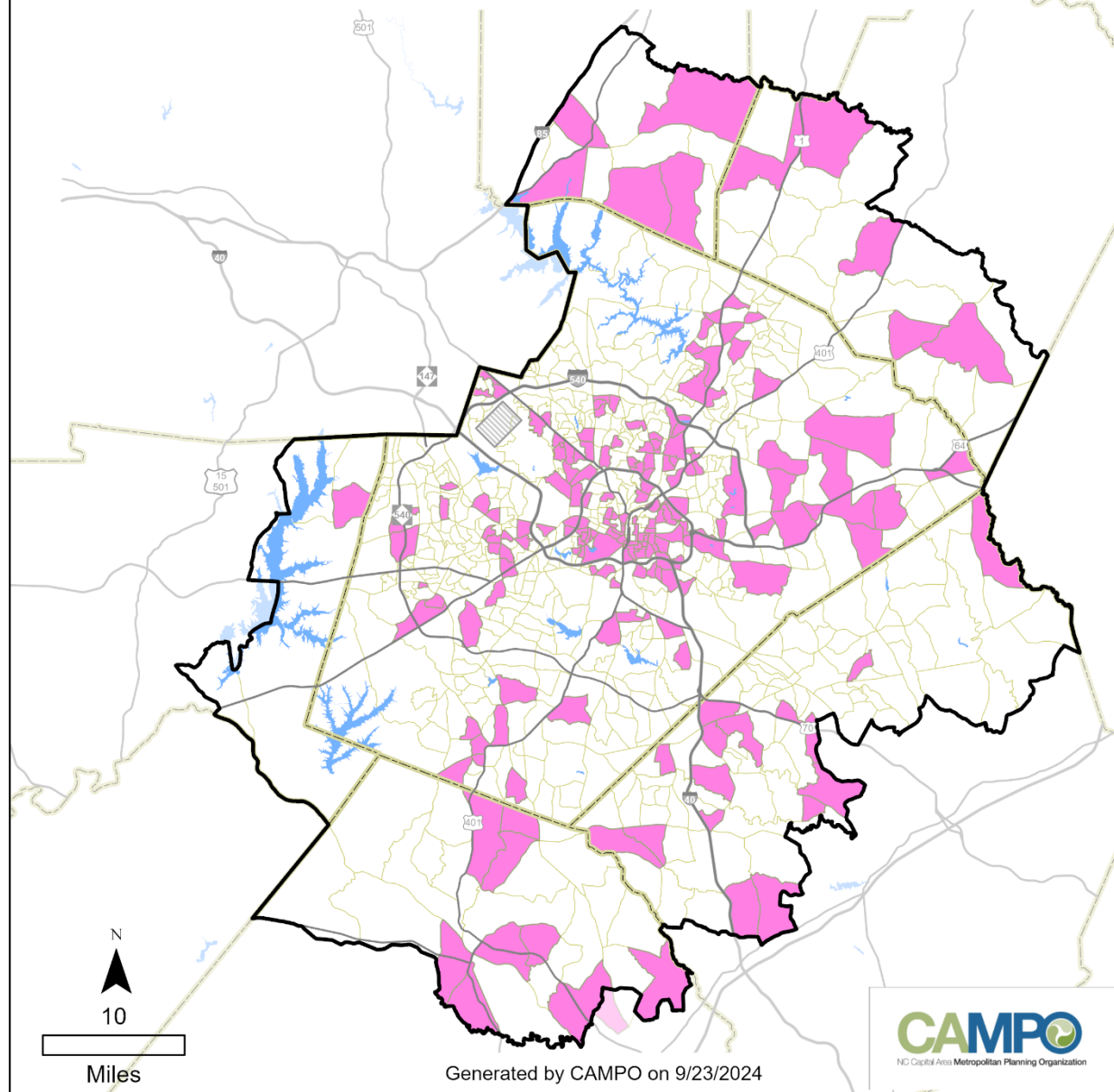
DEMOGRAPHIC PROFILES: ZERO CAR HOUSEHOLDS

Under the Title VI Program, CAMPO considers Zero-car Households as a surrogate for the transportation needs of disabled persons. A review of disabled status persons shows that, with a few exceptions in the most rural block groups, there is an even distribution across the region for this measure. This means that, as a standalone measure, Disability does not yield a pattern that allows for targeted outreach and a meaningful analysis. In other words, since it is spread evenly across the region, there are not specific geographic locations that can be targeted using the “Disability status” from the data. This is further described under Methodology below.

After meeting with the regional partners, it was determined that, where transportation is concerned, zero-car households was an available measure that might work. So, if 6.6% of a block group meets the criterion, that block group is included as a CofC for regional outreach and analysis based on the 75th percentile.



Top 25% of Zero-Car Household Census Block Groups



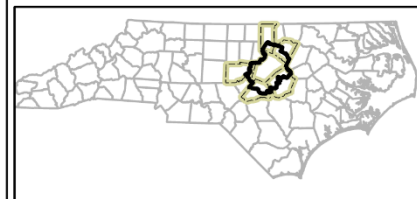
This map shows where concentrations of populations of households with no automobile transportation exist in the region at or above the 5.6% threshold for CAMPO. The threshold represents block groups where at least 5.6% of households reported having no access to a car.

For CAMPO, 5.6% is the cutoff to be in the highest ranking 189 block groups in the region--the top 25% out of 759 total block groups. Any block groups with zero populations are then removed (ex. RDU Airport).

Source Data: 2018-2022 5-Year ACS

- Lakes
- Zero Car HHs
- Major Roadways
- CAMPO Boundary
- Other Block Groups
- Counties in CAMPO Region
- RDU Airport

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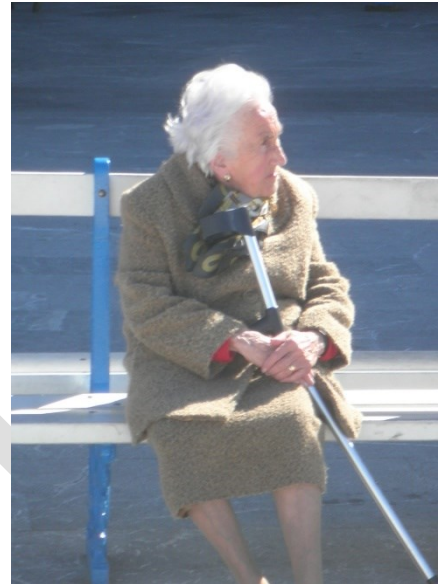


DEMOGRAPHIC PROFILES: AGE

AGE: OVER 70 YEARS OLD

The Older Americans Act of 1965 and the Age Discrimination Act of 1975 made age one of the things we consider when identifying special populations. We looked at populations likely to have a large share of non-drivers—those over 70 years old.

For aging drivers, a person's age is not by itself an indicator of their driving ability. There are people driving safely well into their 90s, while there are others in their 50s and 60s who are dangers to themselves and others when behind the wheel. Physical and mental condition and ability are the main considerations. This includes vision, physical ability, physical activity, diseases, and impacts of medications, etc. Because of the potential loss of their ability to drive, people over 70 were included as an indicator for special consideration for transportation planning. If 12.74% of a block group meets the criterion, that block group is included as a CofC for regional outreach and analysis based on the 75th percentile.

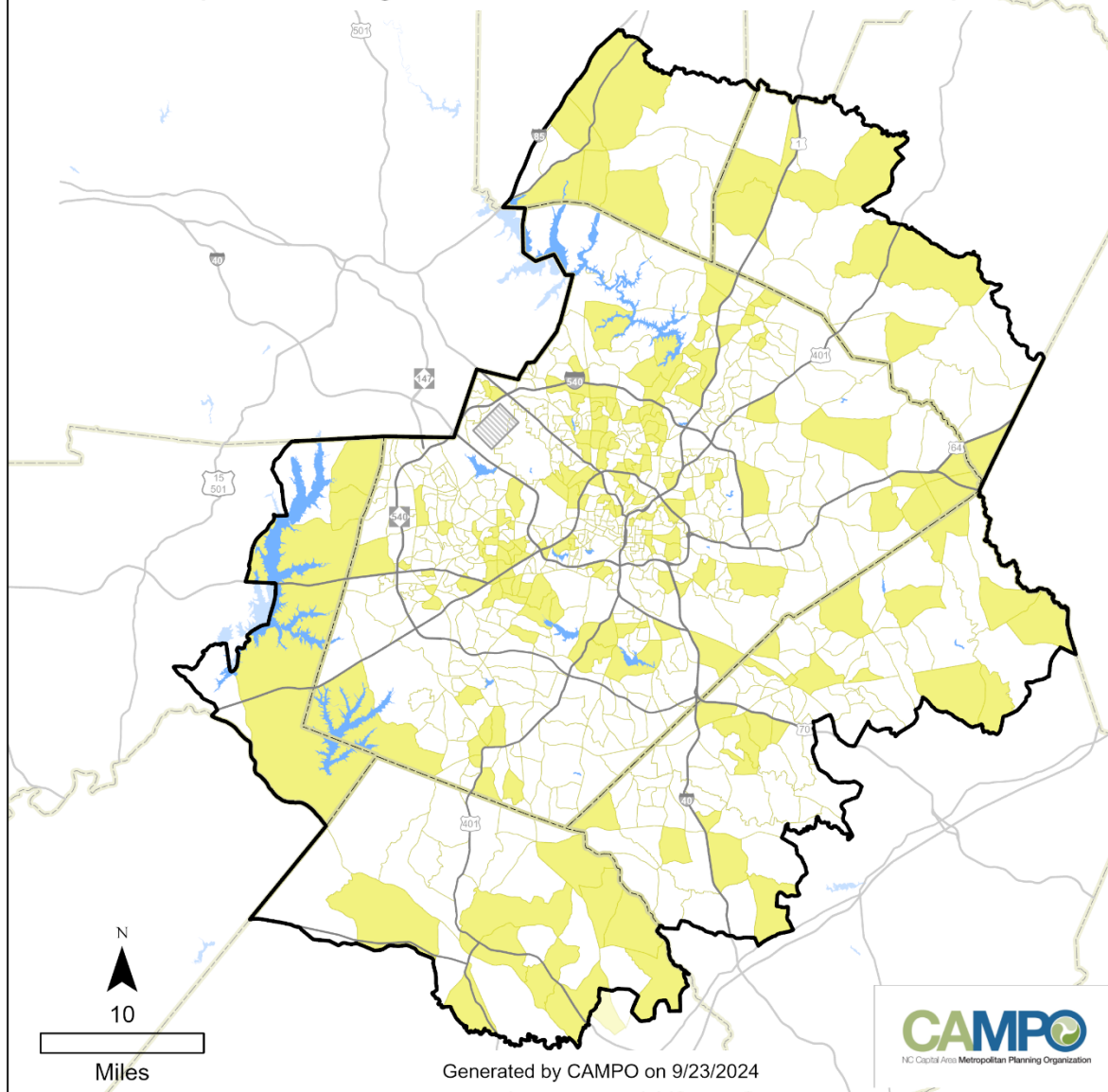


AGED: UNDER 18 YEARS OLD (YOUTH)

While “youth” concentrations are not yet a required environmental justice group by the Federal government when calculating “transportation disadvantaged”, based on current implementation of the Justice 40 Initiative and Executive Order 14096, it is anticipated that this may be a population to include in the near future. For this reason, the following map of census block groups with high concentrations of persons under the age of 18 years old is being included so that it may be utilized in planning public engagement and outreach. The CAMPO methodology for identifying Communities of Concern may be updated in the next few years to include census block groups with the top 25% concentrations of youth population, based on Federal guidance. For now, it is not used in the mapping of CoCs.



Top 25% of Age 70 and Over Census Block Groups



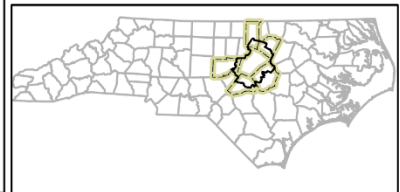
This map shows where concentrations of populations of persons 70 years old and older exist in the CAMPO region at or above the 12.34% threshold. The threshold represents block groups where at least 12.34% of the people living there are at least 70 years old at the time of the survey.

In CAMPO boundaries, 12.34% is the cutoff to be in the highest ranking 189 block groups in the region--the top 25% out of 759 total block groups. Any block groups with zero populations are then removed (ex. RDU Airport).

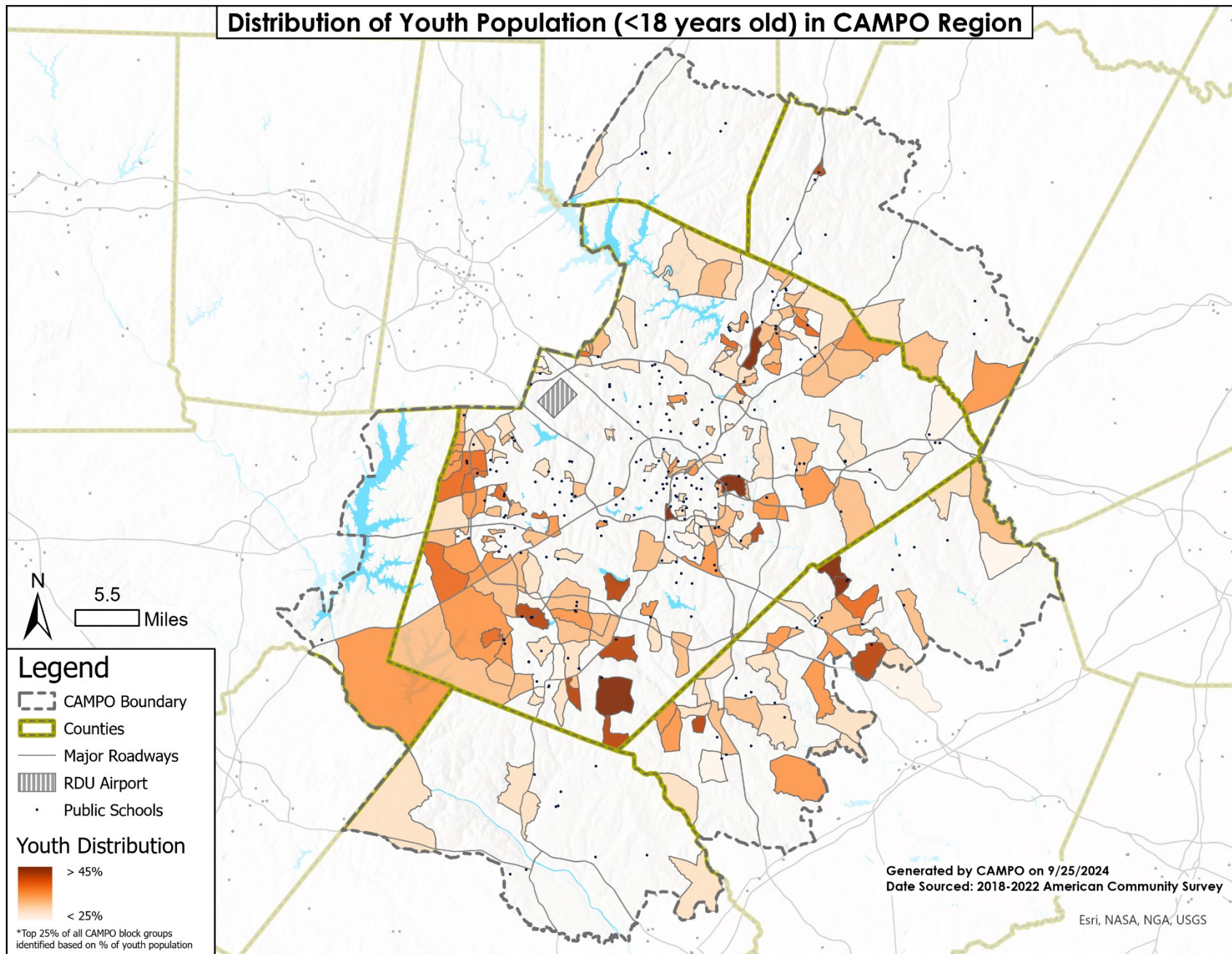
Source Data: 2018-2022 5-Year ACS

-  RDU Airport
-  CAMPO Boundary
-  Major Roadways
-  Counties in CAMPO Region
-  Lakes
-  Age 70+
-  Other Block Groups

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Distribution of Youth Population (<18 years old) in CAMPO Region

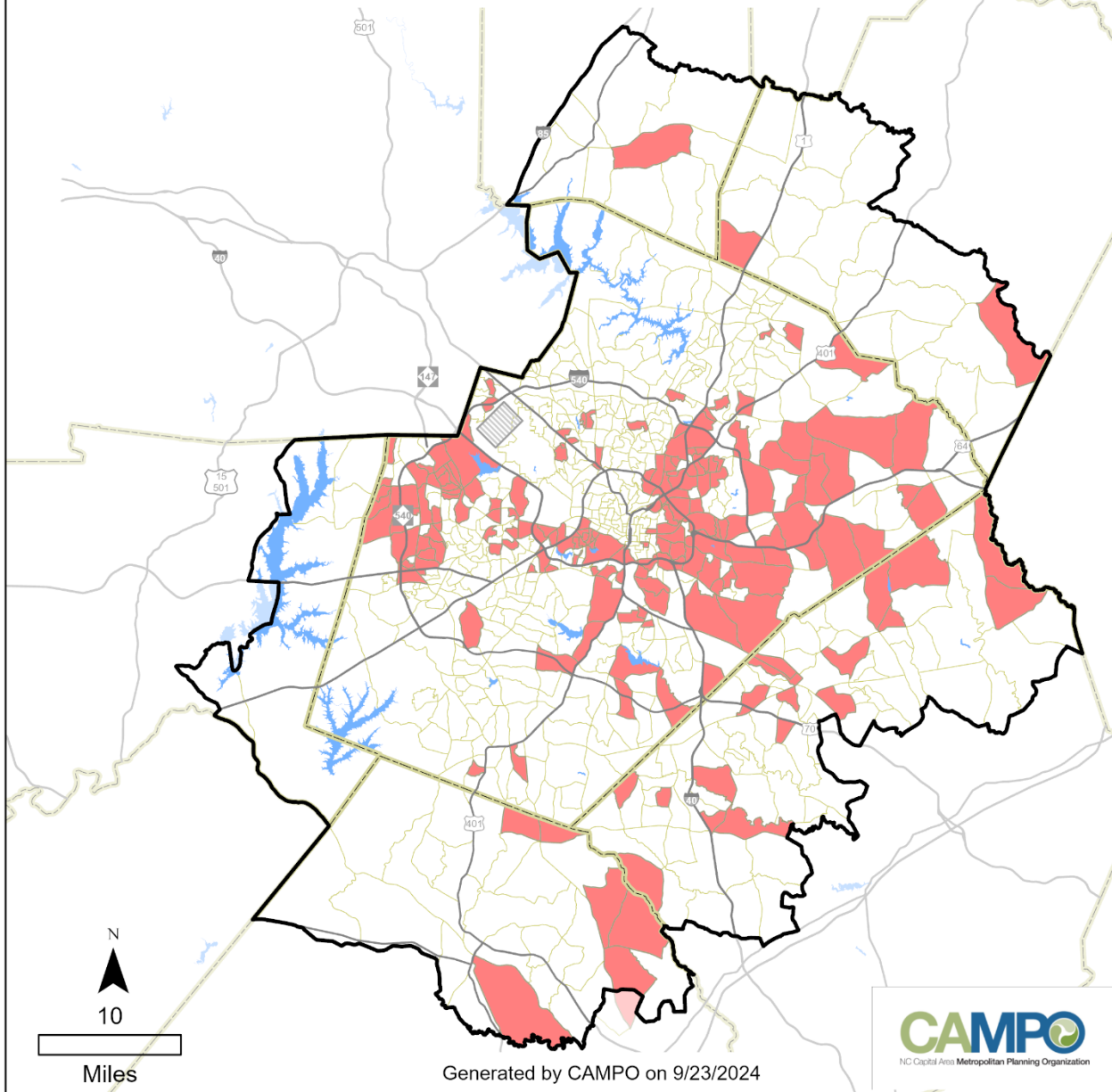


Demographic Profiles: Limited English Proficiency

While limited English proficiency (LEP) is a broad term that includes people who speak another language and “speak English less than very well or not at all,” it can also include individuals with literacy or vision challenges. The census block groups that trigger for LEP are shown here and followed by the final map showing all the overlaps of what was measured. After that, there is a full break out of the Limited English Proficiency Outreach as its own chapter. If 8.02% of a block group meets the criterion, that block group is included as a CofC for regional outreach and analysis based on the 75th percentile.



Top 25% of LEP Census Block Groups



The term "Less than English Proficient" (LEP) refers to individuals who do not speak English as their primary language and who have an ability to read, speak, or write English.

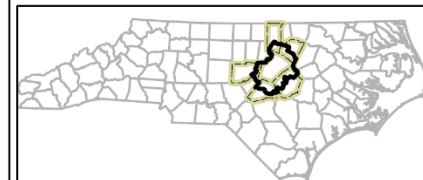
This map shows where concentrations of populations of persons who are LEP exist in the region at or above the 7.37% threshold for CAMPO. The threshold represents block groups where at least 7.37% of the people reported speaking English "less than very well" or worse.

For CAMPO, 7.37% is the cutoff to be in the highest ranking 189 block groups in the region--the top 25% out of 789 total block groups. Any block groups with zero populations are then removed (Ex. RDU Airport).

Source Data: 2018-2022 5-Year ACS

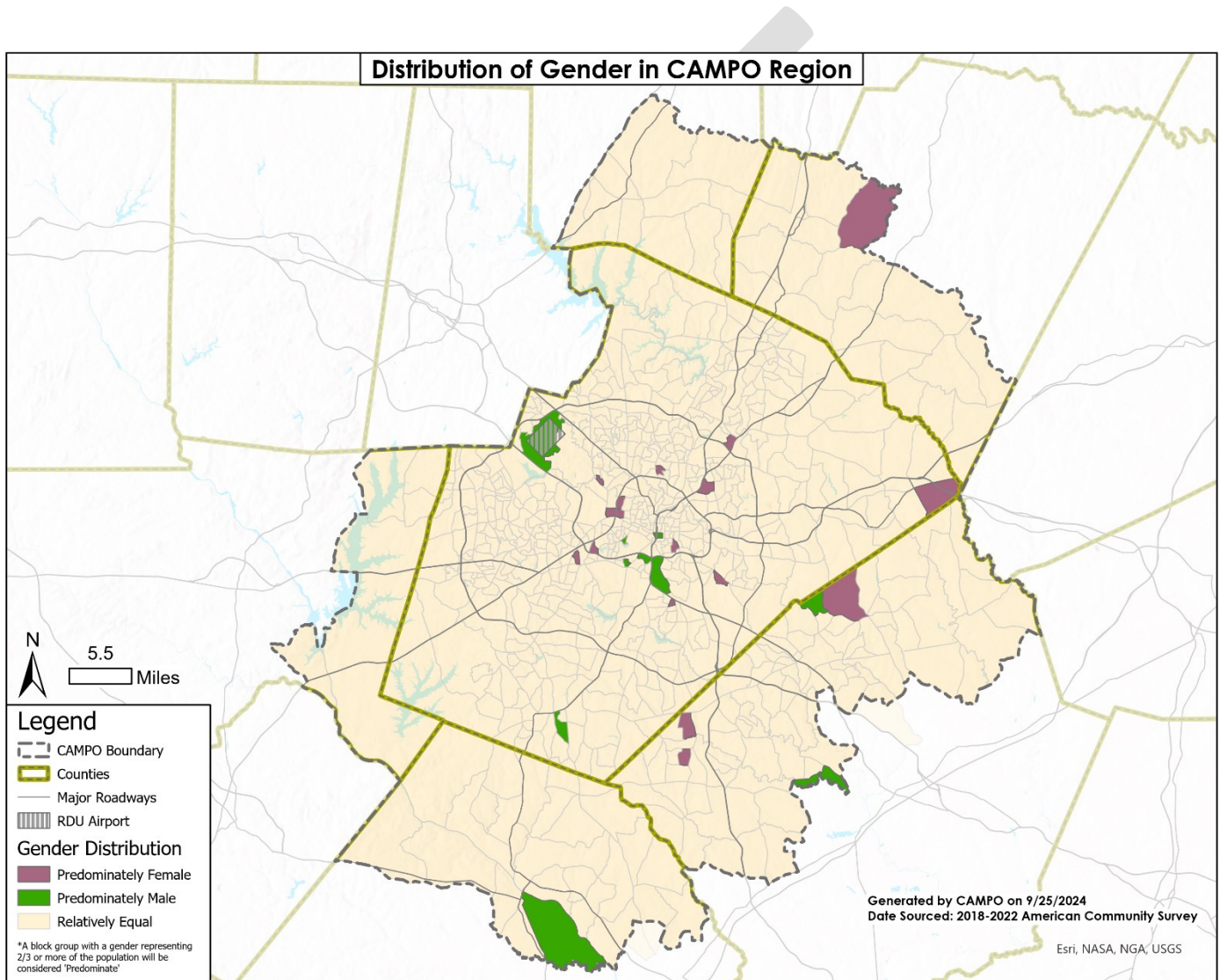
-  RDU Airport
-  CAMPO Boundary
-  Major Roadways
-  Counties in CAMPO Region
-  Lakes
-  Other Block Groups
-  LEP

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DEMOGRAPHIC PROFILES: GENDER

As mentioned in the introduction, the spatial distribution of gender is relatively equal throughout the region other than a few group quarters (college dormitories, etc). The vast majority of the region hovers around 50%, or at least in the middle 1/3. Due to this, it is not used in mapping CofCs.



DEMOGRAPHIC PROFILES: FINAL COMMUNITIES OF CONCERN MAP

Once all the places with concentrations of likely Title VI and EJ populations are mapped, one map is created that **shows where the different categories we measure overlap** one another. To recap, it will show where the following exist in concentrations:

- Non-White Race
- Hispanic/Latino Origin
- Individuals Making less than 150% of the Federal Poverty Rate
- Individuals who speak English “Not at all” or “Not very well”
- Zero-car households
- Individuals Age 70 and older

Where age is the only trigger, those areas are shown differently because age does not cluster spatially like many of the other indicators.



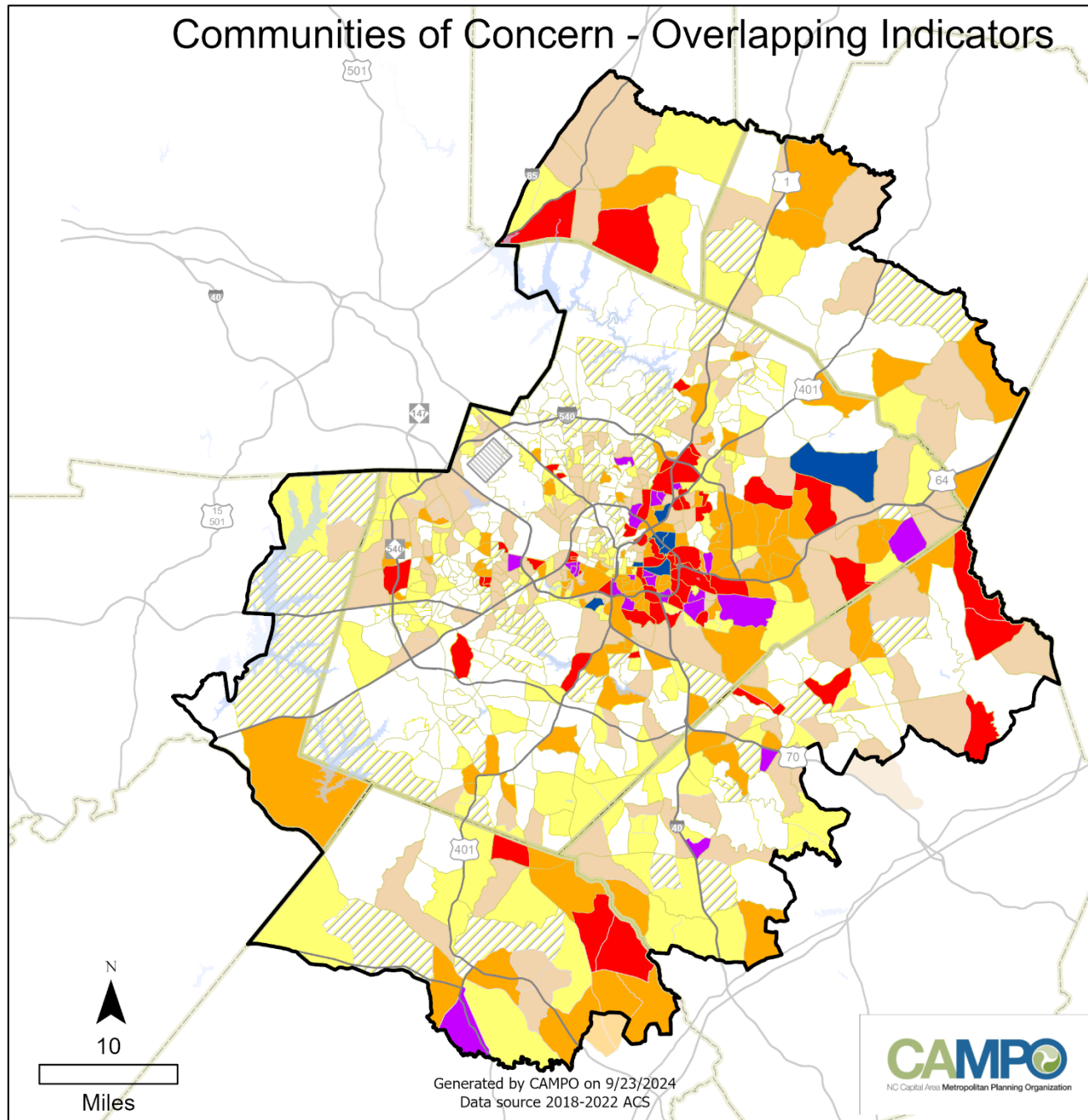
Communities of Concern - Overlapping Indicators

This map is meant to be a regional-scale tool for the MPOs to use in regional-scale planning and regional-scale outreach. It does not identify every community that might meet Title VI protected status, but seeks to identify where there are concentrations of Title VI and other populations subject to protections under the law and associated policies. When working at a more local scale, additional identification may be needed.

The map shows the overlap of 6 indicators at the Census Block Group: Non-white race, Hispanic/Latino Origin, Individuals below 150% of the federal poverty threshold, Less than English Proficient (LEP), Zero-car Households, and Age 70 and over. Each indicator has a threshold calculated for the 75th percentile (top 25%), and any Block Group that meets or exceeds the threshold is included.

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Number of Overlapping Indicators



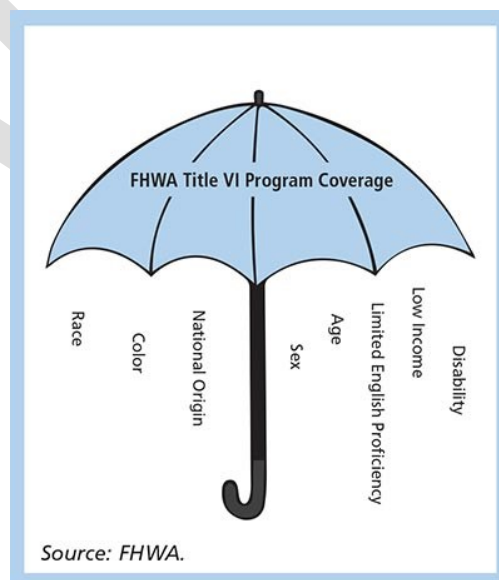
METHODOLOGY FOR DETERMINING IF A BLOCK GROUP IS A REGIONAL-SCALE COMMUNITY OF CONCERN

HOW TO DETERMINE A COMMUNITY OF CONCERN

Capital Area MPO staff looked at many different statistical methods to get at the fundamental question, “What is a Community of Concern?” With that goal in mind, there were 3 principles that guided how to define if an area was “in” or “out” statistically:

- 1) If everyone is special, no one is special; we do not want to set the threshold too low. Ideally around 60% of the region should not trigger 2 or more measures; around 75% one or more.
- 2) Be as inclusive as possible considering the above; we do not want to leave anyone out without good reason.
- 3) The final analysis should yield a pattern that allows for targeted outreach and a meaningful analysis of transportation investments.

CAMPO also tried to match the data that are available to the protected classes under the Title VI Program Coverage umbrella. Statistically, choosing what gets measured has tremendous impact on the outcome. CAMPO coordinated with regional stakeholders involved in the statistical definition of what goes into identifying CofCs in 2016. DCHC MPO, Triangle J Council of Governments and NCDOT Community Studies staff reviewed existing methodologies and a draft proposal from CAMPO using percentiles to determine a threshold for “in” or “out”. Then the group met with FHWA and NCDOT’s Office of Civil Rights.



In looking what to measure, some things came to light:

- Even though gender is a protected class, the even distribution of men and women did not make it a useful measure geographically. As such, it is the one protected class that was not used at all for determining CofCs.
- The same was true for disability in terms of where people are, but for the people affected the most by transportation investments, the group supported using Zero-car Households as a surrogate measure.
- Using a composite “minority” measure may miss some key groups. As an example, a block group that might be included for “Black alone” only needs around 32% of the block group

to identify as Black. In a single minority measure, the threshold is around 57%, and if no other minorities are present this might miss too many people that need to be included. The final selection of how to measure led to using “Non-white Race” and “Hispanic/Latino Origin” as separate variables. Some block groups with Asian minority presence that may not meet the combined race threshold for minority trigger under “Linguistic Isolation” and thus should be included.

It is important to understand that these are regional-scale, planning level proxies for actual EJ communities. When working with individual projects or specific outreach efforts, this analysis is just a guidance or screening tool to begin the identification of the actual communities. CAMPO is committed to understanding and considering the needs/interests of individuals, groups, and communities that are traditionally disadvantaged by the transportation system policies and investments.

The MPO may also utilize other screening tools in order to identify traditionally disadvantaged communities. Two examples are:

- NCDOT’s recently released [“Transportation Disadvantaged Index Dashboard and Screening Tool”](#)
- USDOT’s recently released [“Transportation Disadvantaged Census Tracts Map”](#)

Both tools are still being tested and updated so, for now, CAMPO has determined that the CoCs map provides more exact identification of transportation disadvantaged communities within the MPO area. Currently, the NCDOT and USDOT tools are used most commonly by state and federal officials for prioritizing and programming grant awards. As these and other tools become more refined and additional guidance or regulations are released, CAMPO will review whether to switch for identification of communities of concern - specifically for the MTP and TIP equity analyses. Use of alternative tools and dashboards for the planning of public engagement and outreach activities is acceptable, while the CoCs maps will be the primary guide to identify benefits and disproportionately negative impacts on minority and low-income populations and communities.



Limited English Proficiency (LEP) Plan



LIMITED ENGLISH PROFICIENCY (LEP)

The Limited English Proficiency (LEP) policy guidance provided by the U.S. Department of Transportation (USDOT) (see attached pages A-1 and A-2) is to clarify the responsibilities of recipients of federal financial assistance from the USDOT and assist them in fulfilling their responsibilities to LEP persons, pursuant to Title VI of the Civil Rights Act of 1964, and other implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 40 42 U.S.C. 2000D, and its implementing regulations providing that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

LEP: EXECUTIVE ORDER 13166

Executive Order 13166, improving access to services for persons with limited English proficiency, reprinted as 65 FR 20121 program (August 16, 2000), directs the Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such documents be consistent with the compliance standards and framework detailed as part of justice and policy guidance entitled Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons with Limited English Proficiency (see 65 FR 50123, August 16, 2000, USDOJ's General LEP and other Guidance). Disparate treatment based on a person's inability to speak, read, write, or understand English may be a type of national origin discrimination. It does not apply to illiterate English speakers.

The LEP Plan is in place to ensure access to the planning process and information published by the MPO for persons who do not speak or read English proficiently. The term LEP, describes individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

LEP: DEFINED

Language and literacy barriers prohibit people who identify as LEP from obtaining services and information relating to transportation services and programs. Because LEP populations are not able to read instructions or correspondence written in English and may not understand verbal information, they often are not aware of regulatory requirements and legal implications of the services they seek. It is essential that MPO staff and other recipients or sub-recipients of federal funds become informed about their diverse clientele from a linguistic, cultural, and social perspective. These individuals should become culturally competent, so they can encourage

vulnerable LEP/minority populations to access and receive appropriate transportation services with more knowledge and confidence.

What is low literacy? What is English proficiency? According to the Census data, in 2019, approximately 22 percent of the U.S. population 5 years old and over spoke a language other than English at home, up from 18 percent in 2000. And, among those households, almost 20% are considered “limited English-speaking”, or households in which there are no members aged 14 or over who speak only English or speak English “very well”. LEP individuals have low English literacy and may or may not be literate in their primary language. In many cases, there is a direct correlation between low literacy, limited English proficiency, low educational attainment, and low-income.

USDOT guidelines require that recipients of federal financial assistance provide “meaningful access to programs and activities” by giving LEP persons adequate and understandable information and allowing them to participate in programs and activities, where appropriate. The MPO will take “reasonable steps” to remove barriers for LEP individuals. Once identified, the MPO will make every reasonable effort to ensure the LEP populations have timely and inclusive access to its information and processes.

LEP: PLAN SUMMARY/FOUR FACTOR ANALYSIS

As a recipient of federal funding, the MPO must take reasonable steps to ensure meaningful access to the information and services it provides. As noticed in the Federal Register, Volume 70, Number 239, Wednesday, December 14, 2005, there are **four factors** to be considered in determining reasonable steps:

1. The number and proportion of LEP persons in the eligible service population;
2. The frequency with which LEP persons come in contact with the program or activity;
3. The importance of the program services/activities to the LEP persons; and,
4. The resources available to the recipient and costs.

USDOT policy guidance gives recipients substantial flexibility in determining what language assistance is appropriate based on a local assessment of the four factors listed above. The following is an assessment of the need in the Capital Area MPO in relation to the four factors and the transportation planning process.

LEP: NUMBER & PROPORTION OF LEP PERSONS IN THE ELIGIBLE SERVICE POPULATION

The NC Capital Area MPO (CAMPO) planning area consists of Wake County and portions of Chatham, Franklin, Granville, Harnett, and Johnston Counties. The first step toward understanding the profile of individuals who could participate in the transportation planning process is a review of census data. The data from the 2018-2022 American Community Survey indicates that in all MPO planning areas, English is the primary language spoken at home. Census data for individual cities is not readily available. Table 1 displays the general characteristics, language, estimated population, and percent of individuals who would be classified as LEPs by counties that are part of the CAMPO area. No LEP groups reached 5%, the safe harbor threshold.

Spanish continues to be the primary language that triggers the potential need for targeted outreach and proactive translation of materials for CAMPO. The 2018-2022 ACS data estimates almost 53,000 native Spanish speakers who speak English "Less than very well" in the 6-county MPO region. That is 3.32% of the CAMPO area population.

LEP: FREQUENCY WITH WHICH LEP INDIVIDUALS COME IN CONTACT WITH PROGRAMS OR ACTIVITIES

Although targeted specifically at outreach events, current contact with LEP individuals is relatively infrequent. However, our commitment to serve this group is a priority. In recent years, during public engagement phases for both special studies and the development of the Metropolitan Transportation Plan, the most common engagement tactics have included: translation of surveys into Spanish, translation of primary/summary outreach materials in Spanish, and translation of webpages in language of participant's choice. In areas with more concentrated LEP populations, LEP individuals sometimes attend the MPO events with English-speaking family members, or our community and agency partners at these events are bilingual and translate as needed. MPO staff have also increased the number of tabling events at businesses with a high frequency of Spanish speaking customers and cultural festivals and markets with high volumes of Spanish speaking, and Asian-American, attendees. To date, no request has been made by either



individuals or groups directly to the MPO for Spanish or other language interpreters or publications. Nevertheless, arrangements have been made with the Town of Cary for a list of vendors who can provide translation and interpretation services in languages other than English to be available, if needed.

LEP: THE IMPORTANCE OF THE SERVICE PROVIDED BY THE PROGRAM

CAMPO programs use federal funds to plan for future transportation projects and, therefore, do not include any service or program that requires vital, immediate, or emergency assistance such as medical treatment or services for basic needs, like food or shelter. However, the MPO must ensure 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 LEP is part of the evaluation process for use of federal funds in three major areas: 1) an annual unified planning work program, 2) a 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 do have an impact on all residents. Understanding and involvement are encouraged throughout the process. The MPO is concerned with input from all stakeholders, and every effort is made to make the planning process as inclusive as possible.

Progress towards project planning and construction under the responsibility of local or state jurisdictions and transportation agencies is not within the MPO's authority. These state and local organizations have their own policies to ensure LEP individuals can participate in the process that shapes where how and when a specific transportation project is implemented.

LEP: RESOURCES AVAILABLE TO THE RECIPIENT AND THE OVERALL MPO COST

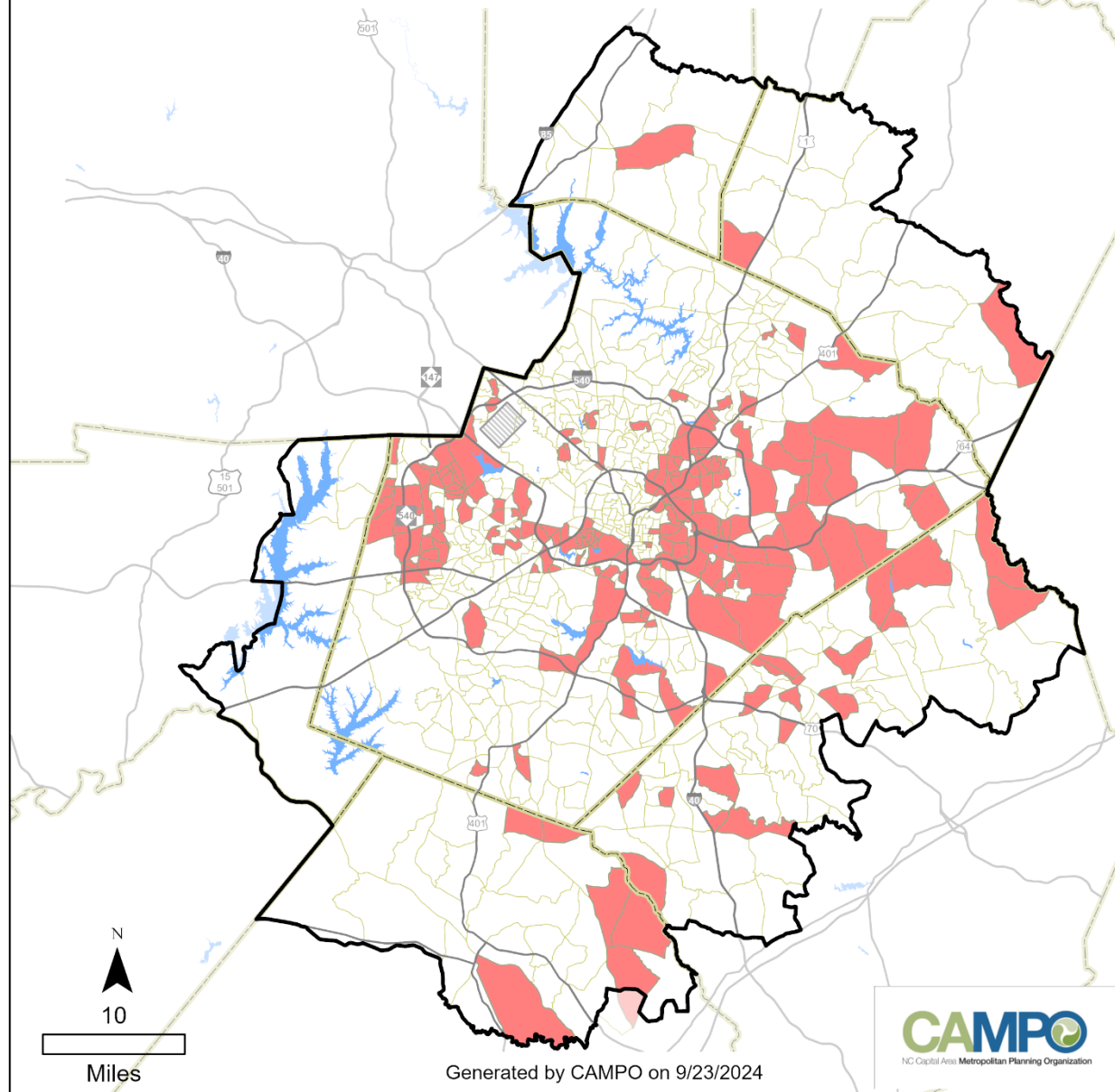
Given the size of the LEP population in the MPO's planning boundary and financial constraints, full translation of all transportation plan documents, except for vital documents (a document that contains information critical to obtaining federal funds or benefits), is not feasible at this time. However, continued growth of our area and its Spanish-speaking population makes offering Spanish translation, in many areas, a good community investment; therefore, the MPO will make efforts to collaborate with state and local agencies to provide language translation and interpretation services where practical within the scope of funding available.

The Capital Area MPO will use a "seven business day" notification statement in order to be accommodating to the public. If the seven-day notice becomes impractical to meet LEP assistance requests, this LEP plan standard will be changed.

Language Information	Number of Persons	% Speak English less than "very well"
6 - County Region Total	1594242	
Speak only English	1339717	
Spanish:	135990	
Speak English less than "very well"	52917	3.32%
French, Haitian, or Cajun:	8935	
Speak English less than "very well"	1709	0.11%
German or other West Germanic languages:	4832	
Speak English less than "very well"	408	0.03%
Russian, Polish, or other Slavic languages:	6621	
Speak English less than "very well"	1503	0.09%
Other Indo-European languages:	32048	
Speak English less than "very well"	6921	0.43%
Korean:	4103	
Speak English less than "very well"	1592	0.10%
Chinese (incl. Mandarin, Cantonese):	12200	
Speak English less than "very well"	4852	0.30%
Vietnamese:	5554	
Speak English less than "very well"	3059	0.19%
Tagalog (incl. Filipino):	3248	
Speak English less than "very well"	911	0.06%
Other Asian and Pacific Island languages:	21419	
Speak English less than "very well"	5075	0.32%
Arabic:	8943	
Speak English less than "very well"	3109	0.20%
Other and unspecified languages:	10632	
Speak English less than "very well"	2024	0.13%
1000 is the threshold for secondary consideration (Safe Harbor)		
Secondary may not be applicable in grouped categories		

(U.S. Census Bureau, 2018-2022 5-Year ACS Survey; Table C16001)(U.S. Census Bureau, 2018-2022 5-Year ACS Survey; Table C16001)

Top 25% of LEP Census Block Groups



The term "Less than English Proficient" (LEP) refers to individuals who do not speak English as their primary language and who have an ability to read, speak, or write English.

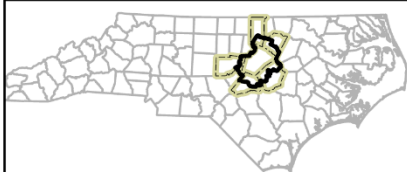
This map shows where concentrations of populations of persons who are LEP exist in the region at or above the 7.37% threshold for CAMPO. The threshold represents block groups where at least 7.37% of the people reported speaking English "less than very well" or worse.

For CAMPO, 7.37% is the cutoff to be in the highest ranking 189 block groups in the region--the top 25% out of 789 total block groups. Any block groups with zero populations are then removed (Ex. RDU Airport).

Source Data: 2018-2022 5-Year ACS

- RDU Airport
- CAMPO Boundary
- Major Roadways
- Counties in CAMPO Region
- Lakes
- Other Block Groups
- LEP

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LEP: MEETING THE REQUIREMENTS

LANGUAGE ASSISTANCE PLAN

As a result of the four-factor analysis, a Language Assistance Plan is *not* required at this time, however, the following Plan represents CAMPO's commitment to ensuring nondiscrimination and meaningful access by persons who are Limited English Proficient. Engaging the diverse population within the MPO boundaries is important. CAMPO is committed to providing quality services to all community members, including the LEP population we serve.

LEP: PROVIDING NOTICE TO EJ POPULATIONS INCLUDING LEP PERSONS

The USDOT LEP guidance indicates that once an agency has decided, based on the four factors, to provide language services, it is important that the recipient notify LEP persons of service is available free of charge in languages LEP persons would understand. Examples of methods of notification include:

1. Stating in outreach documents that language services are available
2. Signage that free language assistance is available with advance notice
3. Working with community-based organizations and other stakeholders to inform LEP individuals of the MPO services and the availability of language assistance
4. Providing information as to the availability of translation services (free of charge) when advertising for MPO hosted public hearings or public meetings.

Other reasonable steps will depend on:

- The number and proportion of LEP persons potentially served by the program or activity and the variety of languages spoken in the service area.
- The frequency with which LEP individuals are affected by the program or activity.
- The importance of the effect of the program on LEP individuals.
- The resources available to the recipient and the urgency of the situation.
- The level of services provided to fully English proficient people.
- Whether LEP persons are being excluded from services or provided a lower level of services.
- Whether the recipient has adequate justification for restrictions, if any, on special language services or on speaking languages other than English.

The Capital Area MPO intends to take reasonable steps to make available interpreter services, free of charge, and to include, at a minimum, Spanish translators upon request of at least seven business days prior to MPO Executive Board and committee meetings, as well as other public

meetings or events. The MPO is defining an interpreter as a person who translates spoken language as opposed to a translator who translates written language and transfer the meaning of the text from one language into another.

Ongoing MPO service standards include:

- Coordination with the Town of Cary personnel department to provide a telephone hotline interpreter for phone and/or walk-in persons.
- Coordination with non-English newspapers to translate legal advertisements.
- Coordination with partner agencies and special needs organizations to meet requested needs.
- The MPO maintains an online presence and strives to make both translation engines for many languages and automated readers/text resizing for the visually impaired or those with literacy challenges available.
- Creation of a list of inside and outside sources that can provide competent oral interpretation and written translation services.
- Analysis of the cost of these services and identification of potential budget and personnel limitations pertaining to these services.

TITLE VI AND LEP: MONITORING AND UPDATING

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 / LEP: MPO STAFF TRAINING

MPO staff will be provided with the Title VI/LEP plan and will be instructed on procedures and services available at least once every three (3) years. 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 and staff involved in delivering public engagement activities, will receive annual refresher training. This information will also be part of the MPO staff orientation process for new hires within 15 business days of their start date. Such training will be developed to ensure that staff are fully aware of Title VI and LEP policies and procedures and are effectively able to work in person and/or by telephone with LEP individuals. Trainings will be provided and/or organized by the Title VI Coordinator and will often coincide with updates to 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.

MPO Executive Board members will receive a copy of the Title VI/LEP plan and have access to training, assuring they are fully aware of and understand the Plan and its implementation.

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the MPO will evaluate, and update if appropriate, the Title VI/LEP plan as needed on a four-year basis. Each update should examine all Plan components, such as:

- Number of LEP persons encountered
- Were their needs met?
- Were any complaints received?
- What is the current LEP population of the MPO area by County?
- Has there been a change to the languages where interpretation and translation services may be needed?
- Have available resources, such as technology, staff, and financial costs, changed?
- Has CAMPO fulfilled the goals of the Title VI/LEP plan?

TITLE VI/LEP: DISSEMINATION OF THE TITLE VI/LEP PLAN

In accordance with 23 CFR 200.9(b)(12) and 49 CFR 21.9(d), CAMPO will utilize community outreach and public education to disseminate Title VI/LEP 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 CAMPO's Title VI Policy Statement in the Board Room at the office, at MPO hosted public meetings, and prominently in any public facing documents and reports we distribute;
- Prominently posting a link to the Title VI/LEP Plan on the website at www.campo-nc.us. Any person, including social service, nonprofit, and other community partners with Internet access, will be able to access the plan. For those without personal Internet service, County libraries offer free Internet access.

*"CAMPO 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 Bonnie Parker at (984) 542-3604; Bonnie.Parker@campo-nc.us."*

- Translating information into languages other than English that meet the LEP safe harbor threshold (the CAMPO region does not include any of these populations);
- Incorporating Title VI language into our contracts and agreements (See Appendix A for Title VI Contract Language); and
- Ensuring any contractors and sub-recipients for the MPO also receive and disseminate Title VI information.
- Copies of the Title VI/LEP Plan are provided to each Technical Coordinating Committee member, the Clerk to each member jurisdiction, NCDOT, FHWA, FTA, and any person or agency requesting a copy.

Please refer to our Public Participation Plan (PPP) for additional outreach methods we employ to comply with Title VI. The 2023 Update to the PPP also includes a set of performance measures and targets that are compatible with Title VI, language assistance, and meaningful engagement. Our PPP can be found at www.campo-nc.us.

TITLE VI/LEP: EXTERNAL DISCRIMINATION COMPLAINT PROCEDURES

These external discrimination complaint procedures apply to the Capital Area Metropolitan Planning Organization (CAMPO), and cover complaints filed under Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities applicable to programs, services, or activities carried out by CAMPO or its agents.

CAMPO will make every effort to obtain early resolution of complaints at the lowest level possible. Complaints of alleged discrimination will be investigated by the appropriate authority. The option of informal mediation between the affected parties and CAMPO staff may be utilized for resolution. Upon completion of each investigation, CAMPO staff will inform every complainant of all avenues of appeal. Every effort will be made to obtain early resolution of complaints at the lowest level possible by informal means.

The purpose of these discrimination complaint procedures is to describe the process used by CAMPO for processing and investigating alleged complaints of discrimination.

FILING OF COMPLAINTS

Applicability – The complaint procedures apply to the beneficiaries of CAMPO programs, activities, and services, including the public and any consultants/contractors hired by CAMPO.

Eligibility – Any person or class of persons who believes that he/she has been subjected to discrimination or retaliation prohibited by any of the Civil Rights authorities, based upon race, color, sex, age, national origin, or disability may file a written complaint with CAMPO. 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.

Time Limits and Filing Options – A complaint must be filed no later than 180 calendar days after the following:

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

Complaints may be submitted to the following entities:

North Carolina Capital Area MPO, ATTN: Title VI Compliance, 1 Fenton Main Street, Suite 201; Cary, NC 27511; 984-542-3604

North Carolina Department of Transportation, Office of Civil Rights, Title VI/EO Contract Compliance Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or 800-522-0453

US Department of Transportation, Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202-366-4070

Federal Highway Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, 8th Floor, E81-314, Washington, DC 20590; 202-366-0693 / 202-366-0752

Federal Highway Administration, North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010

Federal Transit Administration, Office of Civil Rights, ATTN: Title VI Program Coordinator, East Bldg. 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590

Federal Aviation Administration, Office of Civil Rights, 800 Independence Avenue, SW, Washington, DC 20591, 202-267-3258

US Department of Justice, Special Litigation Section, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, DC 20530, 202-514-6255 or 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.

Complaint Basis – Allegations must be based on issues involving race, color, national origin, sex, age, or disability. The term "basis" refers to the complainant's membership in a protected group category.

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

COMPLAINT PROCESSING

When a complaint is received by CAMPO, the following steps will be followed:

- i. A written acknowledgment and a Consent Release form will be mailed to the complainant within ten (10) business days by registered mail.
- ii. CAMPO cannot investigate Title VI complaints filed against itself but can investigate ADA complaints against itself. CAMPO will consult with the NCDOT Title VI Program to determine the acceptability and jurisdiction of all complaints received. (Note: If NCDOT has jurisdiction, the Title VI Program will be responsible for the remainder of this process. CAMPO will record the transfer of responsibility in its complaints log).
- iii. Additional information will be requested if the complaint is incomplete. The complainant will be allowed 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.
- iv. Upon receipt of the requested information and determination of jurisdiction, CAMPO will notify the complainant and respondent of whether the complaint has sufficient merit to warrant investigation.
- v. If the complaint is investigated, the notification shall state the grounds of CAMPO's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- vi. If the complaint does not warrant investigation, the notification to the complainant shall specifically state the reason for the decision.

COMPLAINT LOG

1. When a complaint is received, the complaint will be entered into the Discrimination Complaints Log with other pertinent information and assigned a Case Number. (Note: All complaints must be logged).
2. The complaints log will be submitted to the NCDOT's Civil Rights office during Title VI compliance reviews. (Note: NCDOT may also 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 F** for a copy of our Discrimination Complaint Form, Complaints Log, and Sample Investigation Template.

COMPLIANCE AND ENFORCEMENT PROCEDURES

FHWA recipients must have mechanisms in place to enforce compliance with Title VI. CAMPO utilizes internal training, meetings, monitoring contractors, technical assistance, and findings from periodic NCDOT reviews to identify deficiencies and potential discrimination. If NCDOT identifies deficiencies, CAMPO will address 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, CAMPO 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 and activities related to Title VI.

If compliance issues are identified with MPO consultants/contractors, CAMPO 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.
- c. Referring the case to the NCDOT for appropriate administrative or legal proceedings.

ADDITIONAL CONSIDERATIONS

CAMPO's Public Participation Plan (PPP) references this plan for special outreach strategies used to increase participation in populations not effectively reached by conventional methods. Many of the populations in the communities of concern fall into this category.

It is important to understand that the community of concern identification is meant to be used at the regional scale. For small area plans, corridor plans, and project-level outreach the community of concern map is a starting point. Additional strategies for outreach and identifying unique populations are likely to be needed at these scales.

Examples of additional methods of identifying where special populations might be could include (but are not limited to):

- Increasing the threshold for the indicators to be above the regional average (mean) or regional median.
- Field surveys
- Outreach to community organizations to assist staff
- Use of Transportation Disadvantaged Screening Tool

Any questions or comments regarding this plan should be directed to the MPO Public Engagement Planner/Title VI Coordinator:

Bonnie Parker, Title VI Compliance-LEP
NC Capital Area MPO
1 Fenton Main Street, Suite 201
Cary, NC 27511
(984) 542-3604
Bonnie.Parker@campo-nc.us

APPENDICES

APPENDIX 1: ADMINISTRATION

Staff Training Form to Ensure Nondiscriminatory Administration of Programs and Services



We are committed to nondiscriminatory administration of our programs and services, organization wide. The Capital Area MPO will remind employees of Title VI nondiscrimination obligations through staff training and use of the **Annual Education and Acknowledgment Form** below. The Title VI Coordinator will periodically assess program operations to ensure this policy is being followed.

Annual Education and Acknowledgement Form

Title VI Nondiscrimination Policy

(Title VI and related nondiscrimination authorities)

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

All employees and representatives of the Capital Area MPO are expected to consider, respect, and observe this policy in their daily work and duties. If any person approaches you with a civil rights-related question or complaint, please direct them to Bonnie Parker at 984-542-3604 or Bonnie.Parker@campo-nc.us.

Acknowledgement of Receipt of Title VI Program

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

Signature

Date

Print Name

APPENDIX 2: RESOURCES

STATE AND FEDERAL WEBSITES

- Data Tools: QuickFacts (U.S. Census Bureau)
<https://www.census.gov/data.html>
- Language Use in the United States: 2019 (U.S. Census Bureau)
<https://www.census.gov/library/publications/2022/acs/acs-50.html>
- FHWA Title VI of the Civil Rights Act and Additional Nondiscrimination Requirements
<https://highways.dot.gov/civil-rights/title-vi-civil-rights-act-1964-and-additional-nondiscrimination-requirements>
- NCDOT Office of Civil Rights
<https://www.ncdot.gov/about-us/board-offices/offices/civil-rights/Pages/default.aspx>
- NCDOT Title VI Nondiscrimination Program
<https://www.ncdot.gov/initiatives-policies/access-for-all/nondiscrimination-program/Pages/default.aspx>
- NCDOT Equity and Transportation Disadvantaged Screening Tool
<https://ncdot.maps.arcgis.com/home/item.html?id=729b46ba1e5f4328bf33a69d6afab0c6>

APPENDIX 3, A-G: STANDARD TITLE VI ASSURANCES, FORMS, AND PROCEDURES

A: STANDARD TITLE VI ASSURANCES

United States Department of Transportation
STANDARD TITLE VI / NONDISCRIMINATION ASSURANCES
DOT Order No. 1050.2A

The North Carolina Capital Area MPO (hereinafter referred to as the “Recipient”) HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the NC Department of Transportation, or the U.S Department of Transportation or its affiliates, it will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 (hereinafter referred to as the Act);
- 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;
- 28 Code of Federal Regulations section 50.3, 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, 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 the Federal Transit 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 hereby gives the following specific assurances with respect to any Federal financial assistance:

1. That the Recipient agrees that each “activity”, “program” or “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, requests for proposals 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 regardless of funding source.

The NC Capital Area 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, disadvantaged or minority 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. That the Recipient shall insert the clauses of Appendix A (sometimes referred to as Exhibit in contracts) of this assurance in every contract or agreement subject to the Act and the Regulations.
4. 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.
5. 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.
6. 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. (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.
7. 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.
8. 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.

By signing this ASSURANCE, the Capital Area Metropolitan Planning Organization 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. The MPO will also comply with any program or compliance reviews, and/or complaint investigations conducted by the FHWA. Records and reports will be kept and submitted for review upon request to FHWA, or its designee in a timely, complete, and accurate way. The MPO will also comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

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.

Signed this ____ day of __, 20 ____.

Executive Director, N.C. Capital Area MPO

*The following CAMPO Federal Requirements
must be included with all MPO contracts for
services, as applicable.*

B: CAMPO FEDERAL REQUIREMENTS

All recipients of federally funded grants or who use federal assistance to support procurements must comply with the applicable provisions of the Federal procurement standards 2 CFR pt. 200. As a result, firms awarded federally funded contracts by Capital Area MPO must comply with the following contract provisions set forth herein, unless a particular award term or condition specifically indicates otherwise. These terms and conditions are hereby incorporated into the Agreement or Contract to which it is attached as an Exhibit.

Definition

“Firm” means any company, corporation, partnership, individual, sole proprietorship, joint-stock company, joint venture, governmental body or other legal entity

Age Discrimination Act of 1975

All suppliers, contractors, subcontractors, consultants, and sub-consultants must comply with the requirements of the Age Discrimination Act of 1975 (Title 42 U.S. Code, § 6101 et seq.), which prohibits discrimination on the basis of age in any program or activity receiving Federal financial assistance.

Americans with Disabilities Act of 1990

All suppliers, contractors, subcontractors, consultants, and sub-consultants must comply with the requirements of Titles I, II, and III of the Americans with Disabilities Act, which prohibits discriminating on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities. (42 U.S.C. §§ 12101– 12213).

Byrd Anti-Lobbying Amendment

All suppliers, contractors, subcontractors, consultants, and sub-consultants must comply with the Byrd Anti-Lobbying Amendment, 31 U.S.C. § 1352 (as amended). Suppliers, contractors, subcontractors, consultants, and subconsultants who apply or bid for an award of \$100,000 or more shall file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of an agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant, or any other award covered by 31 U.S.C. § 1352. Each tier shall also disclose any lobbying with

non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the recipient.

Civil Rights Act of 1964 – Title VI

All suppliers, contractors, subcontractors, consultants, and subconsultants must comply with the requirements of Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq.), which provides that no person in the United States will, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

**Clean Air Act and Federal Water
Pollution Control Act (Clean Water Act)**

All suppliers, contractors, subcontractors, consultants, and subconsultants must comply with the Clean Air Act (42 U.S.C. 7401–7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251–1387), as amended—when contract amounts exceed \$150,000 and agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401–7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251–1387

**Contract Work Hours and Safety Standards
Act**

All suppliers, contractors, subcontractors, consultants, and subconsultants must comply with the Contract Work Hours and Safety Standards Act (40 U.S.C. 3701–3708) and where applicable, all contracts awarded in excess of \$100,000 that involve the employment of mechanics or laborers must comply with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5)

Copeland “Anti-Kickback” Act

All suppliers, contractors, subcontractors, consultants, and subconsultants must comply with the with the Copeland “Antikickback” Act (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR Part 3, “Contractors and Sub-contractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States”). The Act provides that each contractor or sub-recipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled.

Davis-Bacon Act

All suppliers, contractors, subcontractors, consultants, and subconsultants must comply with Davis-Bacon Act, as amended (40 U.S.C. 3141–3148). When required by Federal program legislation, all prime construction contracts in excess of \$2,000 must comply with the Davis-Bacon Act (40 U.S.C. 3141–3144, and 3146–3148) as supplemented by Department of Labor regulations (29 CFR Part 5, “Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction”)

Debarment and Suspension

All suppliers, contractors, subcontractors, consultants, and subconsultants are subject to the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, and 2 C.F.R. Part 180. These regulations restrict awards, subawards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in federal assistance programs or activities.

Drug-Free Workplace Regulations

All suppliers, contractors, subcontractors, consultants, and subconsultants must comply with the Drug-Free Workplace Act of 1988 (41 U.S.C. § 701 et seq.), which requires agreement to maintain a drug-free workplace.

**Education Amendments of 1972
(Equal Opportunity in Education Act) –
Title IX**

All suppliers, contractors, subcontractors, consultants, and subconsultants must comply with the requirements of Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681 et seq.), which provide that no person in the United States will, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any educational program or activity receiving Federal financial assistance.

Energy Policy and Conservation Act

All Suppliers, contractors, subcontractors, consultants, and sub-consultants must comply with the requirements of 42 U.S.C. § 6201 which contain policies relating to energy efficiency that are defined in the state energy conservation plan issued in compliance with this Act.

Fly America Act of 1974

All suppliers, contractors, subcontractors, consultants, and sub-consultants must comply with Preference for U.S. Flag Air Carriers: (air carriers holding certificates under 49 U.S.C. § 41102) for international air transportation of people and

property to the extent that such service is available, in accordance with the International Air Transportation Fair Competitive Practices Act of 1974 (49 U.S.C. § 40118) and the interpretative guidelines issued by the Comptroller General of the United States in the March 31, 1981, amendment to Comptroller General Decision B-138942.

Hotel and Motel Fire Safety Act of 1990

In accordance with Section 6 of the Hotel and Motel Fire Safety Act of 1990, 15 U.S.C. § 2225a, all suppliers, contractors, subcontractors, consultants, and sub-consultants must ensure that all conference, meeting, convention, or training space funded in whole or in part with Federal funds complies with the fire prevention and control guidelines of the Federal Fire Prevention and Control Act of 1974, as amended, 15 U.S.C. § 2225.

**Limited English Proficiency
(Civil Rights Act of 1964, Title VI)
and Executive Order 13166**

All suppliers, contractors, subcontractors, consultants, and sub-consultants must comply with the Title VI of the Civil Rights Act of 1964 (Title VI) prohibition against discrimination on the basis of national origin, which requires taking reasonable steps to provide meaningful access to persons with limited English proficiency (LEP) to their programs and services.

Civil Rights Restoration Act of 1987

Broadened scope, coverage, and applicability of Title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973, to include program activities of federal-aid recipients, sub-recipients and contractors.

Executive Order 12898

Addresses environmental justice in minority and low-income populations by discouraging programs, policies, and activities with disproportionately high and adverse health or environmental effects.

Executive Order 14096

Regarding climate crisis issues, establishing environmental justice initiatives, focusing on transportation disadvantaged populations.

Patents and Intellectual Property Rights

Unless otherwise provided by law, suppliers, contractors, subcontractors, consultants, and sub-consultants are subject to the Bayh-Dole Act, Pub. L. No. 96-517, as amended, and codified in 35 U.S.C. § 200 et seq. All suppliers, contractors, and subcontractors, consultants,

sub-consultants are subject to the specific requirements governing the development, reporting, and disposition of rights to inventions and patents located at 37 C.F.R. Part 401 and the standard patent rights clause located at 37 C.F.R. § 401.14.

Procurement of Recovered Materials

All suppliers, contractors, and subcontractors, consultants, sub-consultants must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 C.F.R. Part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition.

Terrorist Financing

All suppliers, contractors, subcontractors, consultants, and subconsultants must comply with E.O. 13224 and U.S. law that prohibit transactions with, and the provisions of resources and support to, individuals and organizations associated with terrorism.

Trafficking Victims Protection Act of 2000

All suppliers, contractors, subcontractors, consultants, and sub-consultants must comply with the requirements of the government-wide award term which implements Section 106(g) of the Trafficking Victims Protection Act of 2000, (TVPA) as amended (22 U.S.C. § 7104). The award term is located at 2 CFR § 175.15, the full text of which is incorporated here by reference in the standard terms and conditions for federally-funded procurements.

Federal Transit Laws

Specifically, 49 USC Sec. 5332, prohibiting discrimination based on race, color, religion, national origin, sex (including gender identity), disability age, employment, or business opportunity.

Rehabilitation Act of 1973

All suppliers, contractors, subcontractors, consultants, and subconsultants must comply with the requirements of Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, as amended, which provides that no otherwise qualified handicapped individual in the United States will, solely by reason of the handicap, be excluded from participation in, be denied the benefits of, or be subjected

to discrimination under any program or activity receiving Federal financial assistance.

Universal Identifier and System of Award Management (SAM)

All suppliers, contractors, subcontractors, consultants, and sub-consultants are required to comply with the requirements set forth in the governmentwide Award Term regarding the System for Award Management and Universal Identifier Requirements located at 2 C.F.R. Part 25, Appendix A, the full text of which is incorporated here by reference in the standard terms and conditions for federally funded procurements.

USA Patriot Act of 2001

All suppliers, contractors, subcontractors, consultants, and subconsultants must comply with requirements of the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act (USA PATRIOT Act), which amends 18 U.S.C. §§ 175–175c.

Whistleblower Protection Act

All suppliers, contractors, subcontractors, consultants, and sub-consultants must comply with the statutory requirements for whistleblower protections (if applicable) at 10 U.S.C § 2409, 41 U.S.C. 4712, and 10 U.S.C. § 2324, 41 U.S.C. §§ 4304 and 4310.

Termination Provisions

Capital Area MPO may terminate any resulting contract should the Contractor fail to abide by its requirements.

Legal Remedies Provisions

In instances where the Contractor violates or breaches contract terms the MPO shall use such sanctions and penalties as may be appropriate.

Conflict of Interest Provisions

Interest of Members, Officers, or Employees of the Recipient Members of Local Governing Body or Other Public Officials. No member officer or employee of the recipient or its agent no member of the governing body of the locality in which the program is situated and no other public official of such locality or localities who exercises any functions or responsibilities with respect to the program during his tenure or for one year thereafter shall have any financial interest direct or indirect in any contract or subcontract or the proceeds under this agreement. Immediate family members of said member's officers, employees and officials similarly barred from having any financial interest in the

program. The recipient shall incorporate or cause to be incorporated in all such contracts or subcontracts a provision prohibiting such interest pursuant to the purpose of this section.

Access to Records and Record Retainage

In general all official project records and documents must be maintained during the operation of this project and for a period of five years following close out. The Town of Cary as Lead Planning Agency, the comptroller General of the United States, or any of their duly authorized representatives shall have access to any books documents papers and records of the of the Administering Agency which are pertinent to the execution of the Agreement for the purpose of making audits, examinations, excerpts, and transcriptions.

Solicitations for Subcontractors

In all solicitations either by competitive bidding or negotiation made by the contractor for work to be performed under a subcontract, each potential subcontractor or supplier shall be notified of the contractor's obligations under this contract.

Information and Reports

The contractor shall provide all information and reports required under applicable federal and state laws, and shall permit access to its books, records, accounts, other sources of information, and its facilities, as may be determined by CAMPO, the NCDOT, or the Federal Highway Administration to be pertinent to ascertain compliance with applicable statutes and regulations.

Sanctions for Non-Compliance

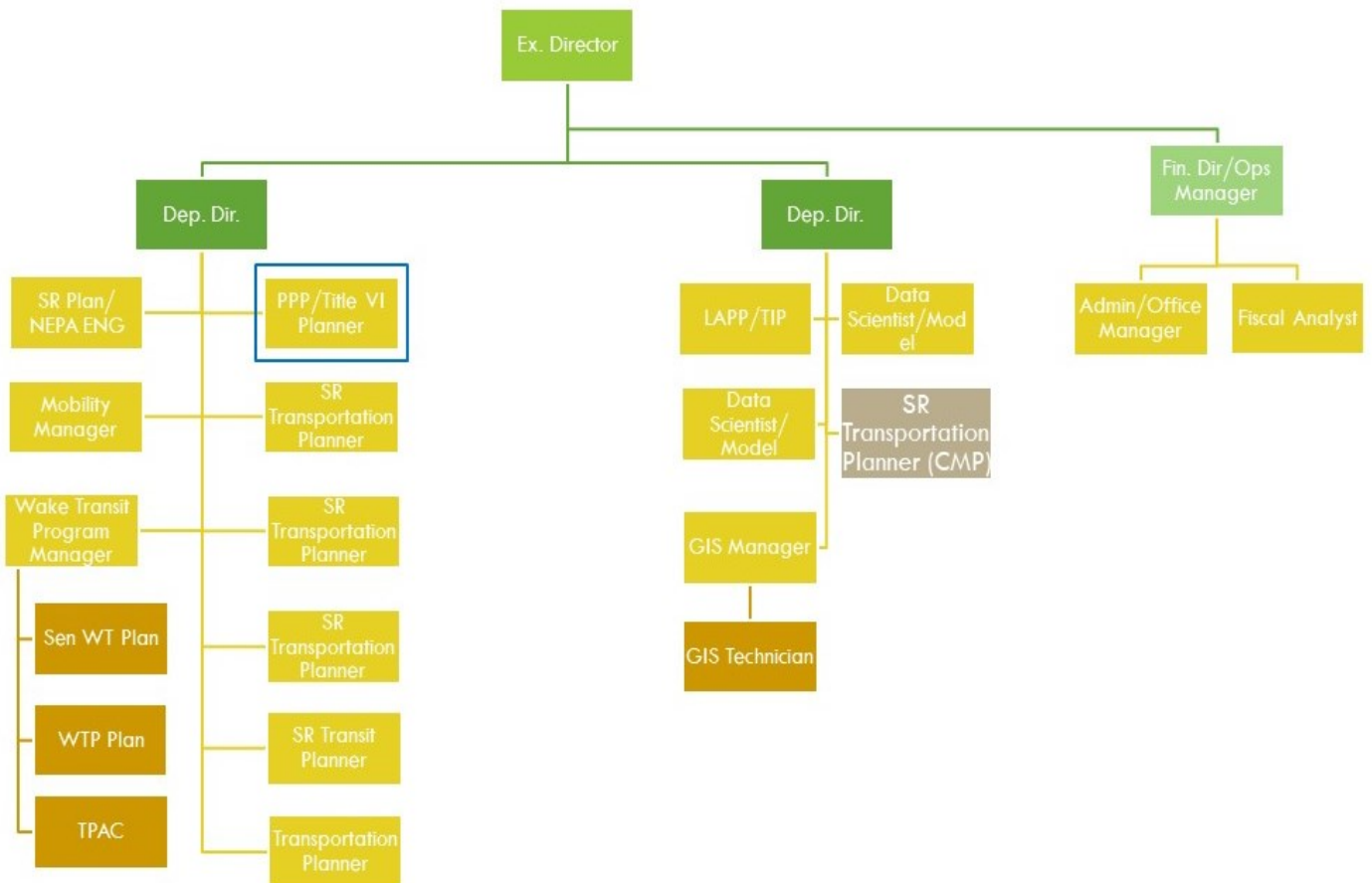
In the event of the contractor's noncompliance with applicable statutes and regulations, CAMPO may impose remedies and sanctions available under applicable laws to it, the NCDOT, or the Federal Highway Administration.

Incorporation of Provisions

Any contractor shall include the provisions of this Exhibit in every subcontract pertaining to work or services to CAMPO, unless exempted by federal or state law. The Contractor shall take such action with respect to any subcontract as the NCDOT or Federal Highway Administration may direct as a means of enforcing such provisions, including sanctions for non-compliance.

C: CHART SHOWING TITLE VI COORDINATOR'S PLACE IN THE ORGANIZATION

CAMPO Organizational Chart – FY 2025



D: DEMOGRAPHIC TABLES

Please note, the following demographic tables use data that is at the **county** level – this is different from our Communities of Concern methodology outlined above, which uses data at a more micro level – “census block group level data”. The data below compiles all six of the counties that CAMPO serves (Chatham, Franklin, Granville, Harnett, Johnston, and Wake). CAMPO’s boundaries cover all of Wake County, but only portions of the other five counties. This means the numbers below include areas not included in CAMPO’s boundary. The data below serves as a snapshot, while the data in the Communities of Concern methodology is more precise.

Race and Ethnicity

The following table was completed using data from U.S. Census Bureau. "ACS Demographic and Housing Estimates." American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP05, 2022

Race and Ethnicity	Number	Percent
Total Population	1,693,458	100
White	1,171,714	71.15%
Black or African American	367,237	22.45%
American Indian or Alaska Native	24,355	1.63%
Asian	112,819	3%
Native Hawaiian and Other Pacific Islander	3,065	.25%
Some other Race	135,760	8.07%
Two or More Races	111,689	6.05%
Hispanic or Latino (of any race)	189,796	11.58%

Age and Sex

The following table was completed using data from U.S. Census Bureau. "Age and Sex." American Community Survey, ACS 5-Year Estimates Subject Tables, Table S0101, 2022

Age	Number			Percent	
	Both sexes	Male	Female	Male	Female
Total Population	1,693,458	834,311	859,147	49.27%	50.73%
Under 5 years	99,216	50,709	48,507	51.11%	48.89%
Under 18 years	395,815	201,782	194,033	50.98%	49.02%
18 to 64 years	1,070,332	532,875	537,457	49.79%	50.21%
65 years and over	227,311	99,654	127,657	43.84%	56.16%
70 years and over	150,606	63,673	86,933	42.28%	57.72%
Median Age	40	39	41		

Disability

The following table was completed using data from U.S. Census Bureau. "Disability Characteristics." American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1810, 2022

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	1,672,140	2000.00	177,981	7843.00	13.87%	0.90
Population under 5 years	99,202	307	570	475	0.57%	4.50
Population 5 to 17 years	296,354	414	15108	2615	6.07%	10.10
Population 18 to 64 years	1,053,691	3901	91941	8251	21.77%	19.10
Population 65 years and over	222,893	1723	70362	5795	76.80%	50.20
SEX						
Male	818,762	2478.00	87,640	5,423	14.23%	1.27
Female	853,378	1186.00	90,341	5105.00	14%	1.10
RACE AND HISPANIC OR LATINO ORIGIN						
White	1,059,485	7,707	117,900	6,528	14.23%	1.08
Black or African American	322,503	5,207	40,646	3,960	16.05%	2.22
American Indian and Alaska Native	6,467	1,887	1,296	550	21.05%	13.35
Asian	94,231	2,223	4,526	969	13%	7
Native Hawaiian and Other Pacific Islander	1,069	452	134	248	6%	31
Some other Race	78,151	7,997	4,794	1,423	5.35%	2
Two or more races	110,234	7,861	8,685	1,930	10%	4
Hispanic or Latino	187,915	904	12,878	2,143	6.90%	2

Poverty

The following table was completed using data from U.S. Census Bureau. "Poverty Status in the Past 12 Months." American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1701, 2022

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	1,659,462	2,681	155,723	11,576	11.30%	1.27
AGE						
Under 18	390,941	1740	46,318	5,997	15.28%	2.85
18 to 64	1,045,628	1986	91,594	6,862	10.23%	1.23
65 years and over	222,893	902	17,811	2,879	9.68%	1.92
SEX						
Male	815,295	2,869	69,394	5,316	10.22%	1.35
Female	844,167	2,177	86,329	7,169	12.32%	1.55
RACE AND HISPANIC OR LATINO ORIGIN						
White	1,051,362	7,630	71,431	7,808	8.12%	1.25
Black or African American	320,368	5,314	48,709	6,707	18.67%	3.85
American Indian and Alaska Native	6,438	1,878	886	481	24.43%	11.98
Asian	93,615	2,264	5,852	1,367	6.68%	4.92
Native Hawaiian and Other Pacific Islander	1,063	412	137	293	8.63%	37.17
Some other Race	77,176	7,844	14,378	4,622	18.38%	7.17
Two or more races	109,440	7,866	14,330	3,649	16.47%	5.55
Hispanic or Latino	186,854	1,352	32,960	6,248	18.70%	5.18
All individuals below:						
50 percent of poverty level	71,797	8,047	x	x	x	x
125 percent of poverty level	212,917	13,791	x	x	x	x
150 percent of poverty level	270,359	15,432	x	x	x	x
185 percent of poverty level	352,516	16,689	x	x	x	x
200 percent of poverty level	387,977	17,011	x	x	x	x

Household Income

The following table was completed using data from Census Table S1901, Income in the Past 12 Months (In 2022 Inflation-Adjusted Dollars): American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1901, 2022

ALL CAMPO COUNTIES	Households	
Subject	Estimate	Margin of Error +/-
Total	636,863	4481
Less than \$10,000	3%	0.71
\$10,000 to \$14,999	4%	0.84
\$15,000 to \$24,999	6%	1.01
\$25,000 to \$34,999	7%	1.03
\$35,000 to \$49,999	9%	1.18
\$50,000 to \$74,999	17%	1.36
\$75,000 to \$99,999	12%	1.29
\$100,000 to \$149,999	18%	1.43
\$150,000 to \$199,999	6%	0.99
\$200,000 or more	10%	1.15
Median income (dollars)	\$76,634.67	\$2,851.17
Mean income (dollars)	\$99,782.00	\$ 3,821.33

The following sections (Title VI Notice, Title VI Voluntary Public Involvement Forms, and the Discrimination Complaint Process must be included with all MPO documents for public involvement AND in materials provided at public events to provide insight into outreach method effectiveness.

E: COMPLAINT PROCESSES

INTERNAL COMPLAINT PROCESS

Initial Contact

As resources, the MPO will provide complainants with an explanation of the filing options, information concerning the discrimination complaint process and a Title VI Discrimination Complaint Form.

The Complaint Review Process

- a. The Title VI Compliance will review complaints upon receipt to ensure that relevant information is provided, the complaint is timely, and satisfies jurisdictional requirements.
- b. All complaints shall be investigated unless:
 - The complaint is withdrawn;
 - The complainant fails to provide required information in a timely manner;
 - The complaint is not filed timely; and
 - Any issues that do not involve discrimination, or are not based on a protected basis will be directed to the appropriate entity. Under no circumstances will complainants be discouraged from filing a complaint.
- c. The MPO's Title VI Compliance Officer will investigate all complaints filed against the MPO's contractors, subcontractors, consultants, and other sub-recipients.
- d. Complaints filed against the MPO will be forwarded to the appropriate state or federal agency for processing and investigation.
- e. Upon determination that the complaint warrants an investigation, the complainant is sent a certified letter acknowledging receipt of the complaint within 10 days of receipt of the complaint. The name of the investigator is provided as well as the complainant's rights under Title VI and related statutes.
- f. The respondent is notified by certified mail that he/she has been named in a complaint and is provided with his/her rights under Title VI and related statutes. The letter identifies the investigator's name and informs the respondent that he/she will be contacted for an interview.

INVESTIGATION

Investigative Plan

The investigator shall prepare an investigative plan that includes, but is not limited to, the following:

- Complainant(s) name and address;
- Respondent(s) name and address;
- Applicable law(s);

- Basis for the complaint;
- Allegations, events or circumstances that caused the person to believe that he/she has been discriminated against;
- Appropriate information needed to address the issue;
- Name of persons to be interviewed and issues of which they have first-hand knowledge;
- Questions for the complainant, respondent, and witness(es);
- Evidence to be obtained during the investigation; and
- Remedy sought by the complainant.

Conducting the Investigation

- The investigation will address only those issues relevant to the allegations in the complaint.
- Confidentiality will be maintained to the fullest extent possible.
- Interviews will be conducted to obtain the facts and evidence regarding the allegations in the complaint. The investigator will ask questions to elicit information about aspects of the case that the witness can provide firsthand information.
- Interviews are taped/recorded with the interviewee's consent.
- A chronological contact sheet is maintained in the case file throughout the investigation.
- The investigation working papers are completed, cross-referenced and indexed.
- The interviewee may have representation of his/her choice at the interview.

Informal Resolution

The Alternative Dispute Resolution (ADR) process is offered as an alternative for resolving Title VI complaints. During the investigative process, the investigator will make every effort to assist the parties with reaching a voluntary, negotiated resolution. During the initial interviews with the complainant and respondent, the investigator will request information regarding specifically requested relief and settlement opportunities. The attempts to resolve complaints using ADR are required by the Alternative Dispute Resolution Act of 1998.

Investigation Reporting Process

- Within 60 days of conducting the investigation, the investigator will prepare an investigative report and submit the report and supporting documentation to the Title VI Compliance for review. The investigative report should include recommended decisions.
- The investigative report should outline the following complaint details: Date of written complaint, contract number, contractor and/or subcontractor name, and the complaint basis (race, color, national origin, et cetera).
- The Title VI Compliance Officer will review the file and investigative report.

Subsequent to the review, the Compliance Officer will submit the investigative reports, investigative files, and recommended decisions to the Executive Director.

- Upon the Director's approval, the investigative report and recommended decisions shall be forwarded to FHWA for a final agency decision.

RECORDS

All records and investigative working files will be maintained in a confidential area within the MPO. Records are kept for ten years internally.

F: FORMS

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.
 - i. 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

- I. **COMPLAINANT(S) NAME** (or attorney for the complainant(s) – name and address if applicable
Name, Address, Phone: 999-999-9999
- II. **RESPONDENT(S)** (or attorney for the respondent(s) – name and address if applicable)
Name, Address, Phone: 999-999-9999
- III. **APPLICABLE LAW/REGULATION**
[For example, Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d); 49 CFR §21.11; 49 CFR §26.53]]
- IV. **COMPLAINT BASIS/(ES)**
[For example, Race, Color, National Origin, Limited English Proficiency, Sex, Age, Disability]]
- V. **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.

VI. BACKGROUND

[Provide detailed information regarding the complaint, including a historical overview of the case, including any activities or actions taken prior to accepting the complaint for investigation.]

VII. INVESTIGATIVE PROCEDURE

[Describe in detail, methods used to conduct the investigation, such as document requests, interviews and site visits. Include witnesses' names and addresses, documents received and/or reviewed, emails sent and received.]

VIII. FINDINGS OF FACT

[Provide a detailed description of the investigator's analysis of each allegation, based on clear and factual findings. Include specific evidence used to support your findings.]

IX. CONCLUSION

[State whether discrimination did or did not occur. Conclusions must be evidence-based and defensible. Test conclusions by considering all possible rebuttal arguments from the respondent and complainant. Both respondent and the complainant should be given an opportunity to confirm or rebut the assertions of the other party and your findings, but all the evidence you've presented should speak for itself.]

X. RECOMMENDED ACTIONS

[Outline what should be done to remedy the findings or, if necessary, provide justice for the complainant.]

APPENDIX

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



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 the Capital Area MPO, within 180 days after the discrimination occurred.

Last Name:		First Name:		☐ Male ☐ Female	
Mailing Address:		City	State	Zip	
Home Telephone:	Work Telephone:	E-mail Address			
Identify the Category of Discrimination: ☐ RACE ☐ COLOR ☐ NATIONAL ORIGIN ☐ AGE ☐ SEX ☐ DISABILITY ☐ LIMITED ENGLISH PROFICIENCY					
Identify the Race of the Complainant ☐ Black ☐ White ☐ Hispanic ☐ Asian American ☐ American Indian ☐ Alaskan Native ☐ Pacific Islander ☐ Other _____					
Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.					
Names of individuals responsible for the discriminatory action(s):					
How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional page(s), if necessary).					
The law prohibits intimidation or retaliation against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.					
Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: (Attached additional page(s), if necessary).					
<u>Name</u>		<u>Address</u>		<u>Telephone</u>	
1. _____					
2. _____					
3. _____					
4. _____					

DISCRIMINATION COMPLAINT FORM – Page 2

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

- ☐ NC Department of Transportation _____
☐ Federal Highway Administration _____
☐ US Department of Transportation _____
☐ Federal or State Court _____
☐ Other _____

Have you discussed the complaint with any Capital Area MPO representative? If yes, provide the name, position, and date of discussion.

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

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

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

COMPLAINANT'S SIGNATURE

DATE

MAIL COMPLAINT FORM TO:

N.C. Capital Area MPO
 1 Fenton Main Street, Suite 201
 Cary, NC 27511
 984-542-3601

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: ☐ NCDOT ☐ FHWA Date Referred: _____



DISCRIMINATION COMPLAINTS LOG

Log Year(s):

CASE NO.	COMPLAINANT NAME	RACE/ GENDER	RESPONDENT NAME	BASIS	DATE FILED	DATE RECEIVED	ACTION TAKEN	DATE INVESTIG. COMPLETED	DISPOSITION
		H/F		Disability					

No Complaints or Lawsuits ☐

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 **the Capital Area MPO** since the previous Title VI Program submission to NCDOT.

Signature of Title VI Coordinator or Other Authorized Official

Date

Print Name and Title of Authorized Official



TITLE VI PUBLIC INVOLVEMENT FORM

Completing this form is **completely** voluntary. You are not required to provide the information requested in order to participate in this event or activity.

In accordance with Title VI of the Civil Rights Act of 1964 and related authorities, the N.C. Capital Area Metropolitan Planning Organization (CAMPO) assures that no person(s) shall be excluded from participation in, denied the benefits of, or subjected to discrimination under any of the Department's programs, policies, or activities, based on their race, color, national origin, disability, age, income, or gender.

Completing this form helps meet our data collection and public involvement obligations under Title VI and NEPA, and will improve how we serve the public. Please give this form to a CAMPO official or mail it to: 1 Fenton Main Street, Suite 201, Cary, NC 27511.

All forms will remain on file at CAMPO as part of the public record.

Zip Code: _____		Gender: ☐ Male ☐ Female	
Street Name: (i.e. Main Street) _____		Age:	
Total Household Income:		☐ Less than 18 ☐ 45-64 ☐ 12,000 – \$19,999 ☐ 70,000 – \$93,999 ☐ 20,000 – \$30,999 ☐ 94,000 – \$117,999 ☐ 31,000 – \$46,999 ☐ 118,000 or greater	
		Have a Disability: ☐ Yes ☐ No	
Race/Ethnicity: Select all that apply and enter additional details in the spaces below. ☐ American Indian or Alaska Native – Enter, for example, Navajo Nation, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, Maya, etc. _____ ☐ Asian – Provide details below. ☐ Chinese ☐ Asian Indian ☐ Filipino ☐ Vietnamese ☐ Korean ☐ Japanese Enter, for example, Pakistani, Hmong, Afghan, etc. _____ ☐ Black or African American – Provide details below. ☐ African American ☐ Jamaican ☐ Haitian ☐ Nigerian ☐ Ethiopian ☐ Somali Enter, for example, Trinidadian and Tobagonian, Ghanaian, Congolese, etc. _____ ☐ Hispanic or Latino – Provide details below. ☐ Mexican ☐ Puerto Rican ☐ Salvadoran ☐ Cuban ☐ Dominican ☐ Guatemalan Enter, for example, Colombian, Honduran, Spaniard, etc. _____ ☐ Middle Eastern or North African – Provide details below. ☐ Lebanese ☐ Iranian ☐ Egyptian ☐ Syrian ☐ Iraqi ☐ Israeli Enter, for example, Moroccan, Yemeni, Kurdish, etc. _____ ☐ Native Hawaiian or Pacific Islander – Provide details below. ☐ Native Hawaiian ☐ Samoan ☐ Chamorro ☐ Tongan ☐ Fijian ☐ Marshallese Enter, for example, Chuukese, Palauan, Tahitian, etc. _____ ☐ White – Provide details below. ☐ English ☐ German ☐ Irish ☐ Italian ☐ Polish ☐ Scottish Enter, for example, French, Swedish, Norwegian, etc. _____			

How did you learn about this meeting? (newspaper advertisement, flyer, and/or mailing) _____

For more information regarding Title VI or this request, please contact the NCDOT Title VI Nondiscrimination Program at (919) 508-1808 or toll free at 1-800-522-0453, or by email at titleVI@ncdot.gov. Thank you for your participation!



NC Capital Area MPO
Attn: Bonnie Parker, Title VI Officer
1 Fenton Main Street, Suite 201
Cary, NC 27511

NC Capital Area MPO
Attn: Bonnie Parker, Title VI Officer
1 Fenton Main Street, Suite 201
Cary, NC 27511

Event/Activity Type: Location:	Date:
TIP No: Project Description:	

Llenar este formulario es un acto **absolutamente** voluntario. No está obligado a brindar la información aquí solicitada para participar en esta actividad. En cumplimiento con el Título VI del Acta de Derechos Civiles de 1964 y autoridades relacionadas, el Departamento de Transporte de Carolina del Norte (NCDOT) asegura que ninguna persona deberá ser excluida de participar en, sus beneficios negados o ser discriminada en cualquiera de los programas, políticas o actividades del Departamento debido a su raza, color, origen nacional, discapacidad, edad, ingreso o género.

Llenando este formulario nos ayuda a cumplir con nuestras obligaciones de recolección de información y participación pública bajo el Título VI y NEPA, además que nos ayudará a servir mejor al público. Por favor, deposite el formulario completo en la urna correspondiente, localizada en la mesa de registro, entrégueselo a un representante del NCDOT o envíelo por correo a: Environmental Analysis Unit, 1598 Mail Service Center, Raleigh, NC 27699-1598

Todos los formularios permanecerán en los archivos del NCDOT como parte del registro público.

Código postal: _____	Género: ☐ Hombre ☐ Mujer
Nombre de la calle: (por ejemplo, Main Street) _____	Edad:
Ingreso total del hogar:	☐ Menor de 18 ☐ 45-64
☐ Menos de \$12,000 ☐ \$47,000 – \$69,999	☐ 18-29 ☐ 65 o mayor
☐ \$12,000 – \$19,999 ☐ \$70,000 – \$93,999	☐ 30-44
☐ \$20,000 – \$30,999 ☐ \$94,000 – \$117,999	¿Tiene alguna discapacidad?: ☐ Sí ☐ No
☐ \$31,000 – \$46,999 ☐ \$118,000 o más	

Raza/Grupo étnico: Seleccione **todas las que apliquen** e ingrese detalles adicionales abajo.

☐ Amerindio o Nativo de Alaska – *Ingrese, por ejemplo, de la Nación Navajo, de la Tribu Blackfeet de la Reserva India Blackfeet de Montana, del Pueblo Nativo del Gobierno Tradicional Inupiat de Barrow, de la Comunidad Esquimal Nome, de los aztecas, de los mayas, etc.* _____

☐ Asiático – *Ingrese más detalles abajo.*

☐ Chino ☐ Indio asiático ☐ Filipino ☐ Vietnamita ☐ Coreano ☐ Japonés

Ingrese, por ejemplo, paquistaní, hmong, afgano, etc. _____

☐ Negro o afroamericano – *Ingrese más detalles abajo.*

☐ Afroamericano ☐ Jamaiquino ☐ Haitiano ☐ Nigeriano ☐ Etíope ☐ Somalí

Ingrese, por ejemplo, trinitario, ganiano, congolés, etc. _____

☐ Hispano o latino – *Ingrese detalles abajo.*

☐ Mexicano ☐ Puertorriqueño ☐ Salvadoreño ☐ Cubano ☐ Dominicano ☐ Guatemalteco

Ingrese, por ejemplo, colombiano, hondureño, español, etc. _____

☐ Del Medio Oriente o Norte de África – *Ingrese más detalles abajo.*

☐ Libanés ☐ Iraní ☐ Egipcio ☐ Sirio ☐ Iraquí ☐ Israelita

Ingrese, por ejemplo, marroquí, yemení, kurdo, etc. _____

☐ Nativo de Hawai o Islas de Pacífico – *Ingrese más detalles abajo.*

☐ Nativo de Hawai ☐ Samoano ☐ Chamorro ☐ Tongano ☐ Fiyiano ☐ Marshalés

Ingrese, por ejemplo, chuukese, palau, tahitiano, etc. _____

☐ Blanco – *Ingrese más detalles abajo.*

☐ Inglés ☐ Alemán ☐ Irlandés ☐ Italiano ☐ Polaco ☐ Escocés

Ingrese, por ejemplo, francés, sueco, noruego, etc. _____

¿Cómo se enteró sobre esta reunión? (anuncio en el periódico, postal o correo directo) _____

Para más información sobre el Título VI o esta solicitud, por favor contacte a la Programa Antidiscriminatorio del Título VI del NCDOT llamando a los teléfonos (919) 508-1808, número gratuito 1-800-522-0453, o por email a titleVI@ncdot.gov.



NC Capital Area MPO
Attn: Bonnie Parker, Title VI Officer
1 Fenton Main Street, Suite 201
Cary, NC 27511

NC Capital Area MPO
Attn: Bonnie Parker, Title VI Officer
1 Fenton Main Street, Suite 201
Cary, NC 27511

Tipo de reunión: Location:	Fecha:
No de TIP: Descripción del proyecto:	

NC CAPITAL AREA MPO TÍTULO VI COMUNICACIÓN PÚBLICA

El Departamento de Justicia de regulaciones de EU, Código 28 de Regulaciones Federales, Sección 42.405, Difusión Pública del Título VI de la información, exigen que el beneficiario de la ayuda financiera del gobierno federal publique o difunda la información del programa a los medios de comunicación. Los anuncios deben indicar que el programa es un programa de igualdad de oportunidades y / o indicar que la ley federal prohíbe la discriminación. Además, deben tomarse pasos razonables para publicar la información en los idiomas de la población a la cual servirán, o que puedan ser directamente afectadas por los proyectos de transporte.

El Capital Area MPO notifica públicamente que es política de la organización asegurar el pleno cumplimiento del Título VI del Acta de Derechos Civiles de 1964, la Ley de Restauración de Derechos Civiles de 1987, la Orden Ejecutiva 12898 Dirección Federal de Acciones para la Justicia Ambiental en Poblaciones minoritarias y poblaciones de bajos ingresos, la Orden Ejecutiva 13166 Mejorar el acceso a los Servicios para Personas con Inglés Limitado, y de los estatutos y reglamentos relacionados con la no discriminación en todos los programas y servicios. La la Organización está comprometido a ofrecer oportunidades de participación significativa en sus programas, servicios y actividades a las minorías, poblaciones de bajos recursos y personas que no dominan bien el idioma Inglés. Además, reconocemos la necesidad de evaluar el potencial de impactos a estos grupos a través del proceso de toma de decisiones, así como la obligación de evitar, minimizar y mitigar impactos adversos en los que son desproporcionadamente altos. Es política la Organización que ninguna persona en los Estados Unidos, **por motivos de raza, color, sexo, edad, nivel de ingresos, origen nacional o discapacidad sea excluido de la participación en, sea negado los beneficios de, o sea de otra manera sujeto a discriminación bajo cualquier programa, actividades o servicios para los que CAMPO recibe asistencia financiera federal.**

Cualquier persona que crea haber sido maltratada por una práctica discriminatoria ilegal en virtud del Título VI tiene derecho a presentar una queja formal con CAMPO. Cualquier queja debe ser por escrito o en persona con MPO, NC Capitol Area MPO, ATTN: Title VI Compliance, One Fenton Main Street, Suite 201, Cary, NC 27511, dentro de los ciento ochenta (180) días siguientes a la fecha en que ocurrió la supuesta discriminación. Los formatos de quejas por discriminación del Título VI pueden obtenerse en la Oficina de Capital Area MPO sin costo alguno o llamando al **984-542-3601**, o a través de Internet en www.campo-nc.us.

PROCESO DE QUEJAS POR DISCRIMINACIÓN

INTRODUCCIÓN

Los procedimientos de quejas presentadas en este documento se aplican al MPO y otros destinatarios principales y los sub-receptores que reciben ayuda Federal. Estos procedimientos se aplicarán a las quejas por discriminación presentadas en virtud del Título VI del Acta de Derechos Civiles de 1964, Ley de Restauración de Derechos Civiles de 1987, la Sección 504 del Acta de Rehabilitación de 1973, y autoridades de la no discriminación en relación con cualquier otro actividades, programa, o servicios administrados por el NCDOT y sus sub-receptores, consultores y contratistas. MPO hará todo lo posible para obtener pronta resolución de las quejas en el nivel más bajo posible de administración. Denuncias de presunta discriminación serán investigadas por las autoridades competentes. La opción de reunión(es) de mediación informal entre las partes afectadas y el personal de Title VI Compliance puede ser utilizada para su resolución. Al término de cada investigación, el personal de la Title VI Compliance informará a cada demandante todas las vías de recurso.

PROPÓSITO

El propósito de los procedimientos de denuncia por discriminación es describir el proceso utilizado por la MPO para tramitar las quejas en virtud del Título VI del Acta de Derechos Civiles de 1964, relacionados con los estatutos y las autoridades.

PRESENTACIÓN DE QUEJAS

1. **Aplicación** – Los procedimientos de queja aplican a los beneficiarios de los programas de la MPO, actividades y servicios, incluyendo pero no limitando a la opinión pública, contratistas, subcontratistas, consultores y otros sub-receptores de fondos federales y estatales.
2. **Elegibilidad** – Cualquier persona o grupo de personas que crea haber sido objeto de discriminación o represalia prohibida por alguna de las autoridades de Derechos Civiles, basada en la raza, color, sexo, edad, origen nacional o discapacidad, puede presentar una queja por escrito a la NC Capital Area MPO, ATTN: Title VI Compliance. La ley prohíbe la intimidación o represalias de ningún tipo. La denuncia podrá ser presentada por la persona afectada o un representante y debe ser por escrito.
3. **Plazos y opciones de presentación** – La queja debe ser presentada a más tardar 180 días naturales después de lo siguiente:
 - La fecha del supuesto acto de discriminación; o
 - La fecha en que la persona(s) se dió cuenta de la supuesta discriminación; o
 - Cuando ha sido un curso continuo de conducta, la fecha en que dicho comportamiento se interrumpió o en el último ejemplo de dicha conducta.

Título VI las quejas podrán presentarse a las siguientes entidades:

- **North Carolina Capital Area MPO**
Attn: Title VI Compliance; 1 Fenton Main Street, Suite 201; Cary, NC 27511;
(984) 542-36901
- **North Carolina Department of Transportation**, Office of Civil Rights, Title VI/EO
Contract Compliance Section, 1511 Mail Service Center, Raleigh, NC 27699-1511;
919- 508-1830 or toll free 800-522-0453

- **US Department of Transportation**, Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202- 366-4070
 - **Federal Highway Administration**, Office of Civil Rights, 1200 New Jersey Avenue, SE, 8th Floor, E81-314, Washington, DC 20590, 202-366-0693 / 366-0752
 - **Federal Highway Administration**, North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010
 - **Federal Transit Administration**, Office of Civil Rights, ATTN: Title VI Program Coordinator, East Bldg. 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590
 - **Federal Aviation Administration**, Office of Civil Rights, 800 Independence Avenue, SW, Washington, DC 20591, 202-267-3258
 - **US Department of Justice**, Special Litigation Section, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, DC 20530, 202-514-6255 or toll free 877-218-5228
4. **Formato de Quejas** – Las denuncias deberán ser **por escrito y firmadas** por el denunciante (s) o un representante, e incluir el nombre del autor, dirección y número de teléfono. Las denuncias recibidas por fax o correo electrónico serán confirmadas y procesadas. Las denuncias recibidas por teléfono serán transcritas y proporcionadas al denunciante para la confirmación o su revisión antes de ser procesadas (la forma sigue). Quejas serán aceptadas en otros lenguajes, incluyendo Braille.
5. **Fundamento de la Queja**– Las denuncias deberán basarse en cuestiones relacionadas con la raza, color, origen nacional, sexo, edad o discapacidad. El término "fundamento" se refiere a la pertenencia del autor de la queja en una categoría del grupo protegido.

Grupo Protegido	Definición	Ejemplos
Raza	Un individuo perteneciente a uno de los grupos raciales aceptados; o la percepción, basada generalmente en las características físicas de que una persona es miembro de un grupo racial.	Afro Americano, Hispano/Latino, Asiático, Indio Americano/Nativo de Alaska, Nativo de Hawai/Islands del Pacífico, Blanco.
Color	Color de piel, incluyendo tono de piel dentro de un grupo racial.	Negro, blanco, moreno claro, moreno oscuro, etc.
Origen Nacional	Lugar de Nacimiento. La ciudadanía no es un factor. La discriminación basada en el idioma o acento de una persona también está cubierta por el origen nacional.	Mexicanos, cubanos, japoneses, vietnamitas, chinos.
Sexo	Género.	Mujer y hombre.
Edad	Personas de cualquier edad.	Personas de 21 años
Discapacidad	Disabilidad física o mental, permanente o temporal, o percibida.	Ciego, alcohólico, para- amputado, epilépticos, diabéticos, artríticos

FORMATO DE QUEJAS POR DISCRIMINACIÓN

Apellido		Nombre:		Hombre Mujer
Dirección:		Ciudad	Estado	Código Postal
Teléfono de Casa:	Teléfono de Trabajo:	Dirección de correo electrónico		
Identificar la categoría de la Discriminación:				
RAZA	COLOR	ORIGEN NACIONAL	EDAD	
RELIGIÓN	DISCAPACIDAD	SEXO/GÉNERO		
Identificar la Raza del Demandante				
Afro Americano	Blanco	Hispano	Asiático Americano	
Indio Americano	Nativo de Alaska	Islas del Pacífico	Otra _____	
Fecha y lugar de la acción discriminatoria alegada(s). Por favor, incluya la fecha más antigua de la discriminación y la fecha más reciente de la discriminación.				
Nombre de las personas responsables de la acción discriminatoria (s):				
¿Cómo fué discriminado? Describir la naturaleza de la acción, decisión, o condiciones de la supuesta discriminación. Explicar lo más claramente posible lo que ocurrió y por qué usted cree que su condición de protección (fundamento) fué un factor en la discriminación. Incluya de qué manera otras personas fueron tratadas de manera diferente a usted. (Si es necesario adjunte páginas adicional (es)).				
La ley prohíbe la intimidación o represalias contra cualquier persona porque él o ella ha tomado medidas, o ha participado activamente, para garantizar los derechos protegidos por estas leyes. Si usted siente que ha sido víctima de represalias, además de la supuesta discriminación, por favor explique las circunstancias a continuación. Explique qué medidas tomó usted que cree que fueron la causa de las supuestas represalias.				
Nombre de las personas (testigos, compañeros de trabajo, supervisores, u otros) que podemos contactar para obtener información adicional y apoyar o aclarar su queja: (Adjuntar pagina(s) adicional(es), si es necesario).				
Nombre	Dirección		Teléfono	
1.				
2.				
3.				
4.				

¿Ha presentado o tiene intenciones de presentar una queja con respecto a cualquiera de las siguientes cuestiones planteadas? En caso afirmativo, indique la fecha de presentación. Marque todas las que aplican. US Comisión de Igualdad de Oportunidades de empleo _____ NC Departamento de Transporte _____ US Departamento de Transporte _____ Corte Federal o Estatal _____ Otros _____	
¿Ha discutido la denuncia con algún representante de NCDOT? En caso afirmativo, indique el nombre, puesto, y fecha de la discusión. 	
Por favor proporcione cualquier información adicional que considere usted pueda ayudar a una investigación. 	
Explique brevemente qué remedio, o acción, está usted buscando debido a la supuesta discriminación. 	
** NO PODEMOS ACEPTAR QUEJAS SIN FIRMAR. POR FAVOR INCLUYA SU FIRMA Y FECHA EN EL SIGUIENTE FORMATO.	
_____ FIRMA DEL SOLICITANTE	_____ FECHA
ENVÍE SU FORMATO DE QUEJA A: NC Capital Area MPO Attn: Title VI Compliance 1 Fenton Main St., Suite 201 Cary, NC 27511 Telephono (984) 542-3601	
FOR OFFICE USE ONLY Date Complaint Received: _____ Processed by: _____ Case #: _____ Referred to: NCDOT FHWA FTA Date Referred: _____ OCR (Rev. 10/10)	

G: COMPLIANCE REVIEW CHECKLIST FOR FHWA SUBRECIPIENTS

General Requirements	Completed
1. A copy of the recipient's signed USDOT Title VI Assurances	☐
2. Title VI Policy Statement (signed)	☐
3. Title VI Notice to Public, including a list of locations where the notice is posted	☐
4. Name and official title of Title VI Coordinator and a list of their Title VI duties	☐
5. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)	☐
6. Title VI Complaint Form	☐
7. List of Title VI complaints, investigations, or lawsuits (i.e., Title VI Complaint Log)	☐
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	☐
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	☐
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	☐
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	☐
12. Compliance and enforcement procedures to ensure nondiscriminatory administration of programs and services	☐
13. A demographic profile of your planning area that includes identification of the locations of minority, low-income, LEP, and/or other underserved populations	☐
14. Information regarding how consultants and/or subrecipients are monitored for compliance with Title VI	☐
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	☐
16. Documentation from any Title VI compliance reviews or investigations conducted by any agency other than NCDOT-OCR in the last three years.	☐