



NC Capital Area **Metropolitan Planning Organization**

Public Participation Plan



Transportation Public Meeting in Apex, NC. 2018

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MPO Background

A Metropolitan Planning Organization, or MPO, is “the forum for cooperative transportation decision making for the metropolitan planning area” (USDOT). The Federal-Aid Highway Act of 1962 created the federal requirement for urban transportation planning. It requires transportation projects in urbanized areas of 50,000 people or more to be based on a “3C” - **continuing, comprehensive and cooperative** planning process if using federal transportation funds.

Continuing deals with the need to periodically re-evaluate and update a plan.

Comprehensive is defined to include 10 elements:

1. Economic factors affecting development
2. Population
3. Land Use
4. Transportation facilities (including transit)
5. Travel Patterns
6. Terminal and transfer facilities
7. Traffic Control Features
8. Zoning ordinances, subdivision regulations, building codes, etc.
9. Financial resources
10. Social and community values, such as open space or historic preservation

Cooperative means to include the federal, state, and local levels of government AND between agencies within the same level of government. (Weiner, 1992)

The Capital Area MPO (CAMPO) serves as the coordinating agency between local governments, the North Carolina Department of Transportation (NCDOT), the Federal Transit Administration (FTA), and the Federal Highways Administration (FHWA). Staff has established a close working relationship with the planning departments of municipalities within the MPO area as well as with the planning staff of the neighboring Durham-Chapel Hill-Carrboro (DCHC) MPO. CAMPO is comprised of three parts: an Executive Board, a Technical Coordinating Committee (TCC), and a staff that serves the members of these boards. The MPO is responsible for carrying out an annual work program approved by the Executive Board, a portion of which includes updating the Metropolitan Transportation Improvement Program (a seven-year project programming schedule) and the Long-Range Transportation Plan (a minimum twenty-year forecast of projects and programs, the 2045 Metropolitan Transportation Plan (MTP) being the most recently adopted).



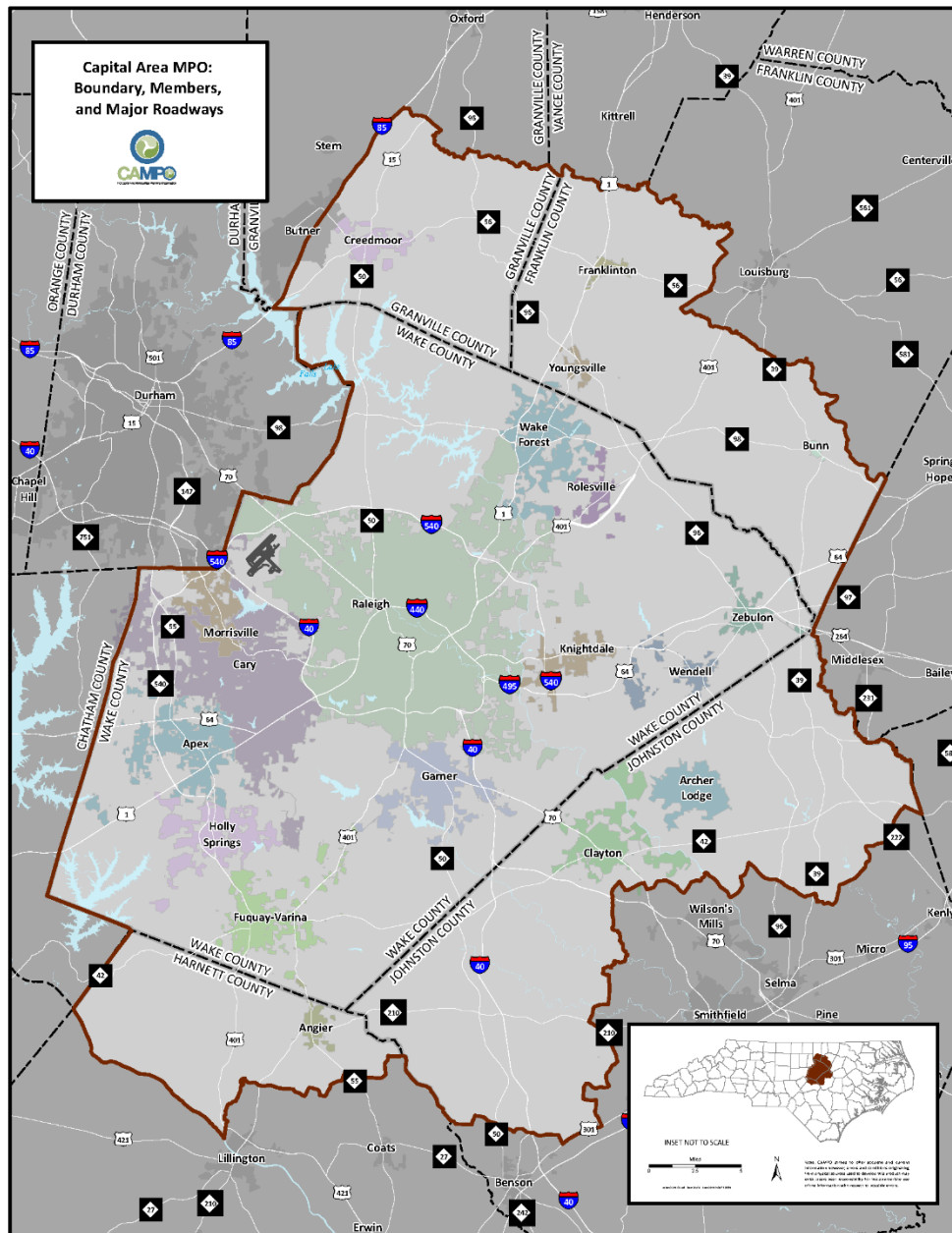
MPO Executive Board Meeting, 2018 (Photo-CAMPO Staff)

CAMPO Geography and Membership

The governing body of the Capital Area MPO is comprised of elected or appointed officials from all of the local governments in the region and agencies including transit agencies and NCDOT. These officials are from the counties of Franklin, Granville, Harnett, Johnson and Wake, the municipalities of Angier, Apex, Archer Lodge, Bunn, Cary, Clayton, Creedmoor, Franklinton, Fuquay-Varina, Garner, Holly Springs, Knightdale, Morrisville, Raleigh, Rolesville, Wake Forest, Wendell, Youngsville and Zebulon, GoTriangle, and the North Carolina Department of Transportation. The governing body also has advisory (non-voting) members from the Federal Highway Administration (FHWA) and North Carolina Turnpike Authority (NCTA).

Technical staff from these jurisdictions and agencies are joined by representatives from other local stakeholder entities such as the Triangle J Council of Governments, Research Triangle Foundation, GoRaleigh, GoCary, a rural and human services transit provider, NC State University, Raleigh-Durham Airport Authority, and the Triangle North Executive Airport to form the Technical Coordinating Committee (TCC).

This plan covers the agencies, member governments, and member government agencies within the MPO and their public participation requirements. Subcommittees and other ad-hoc groups sometimes play a role in the planning process.



Purpose of the Public Participation Plan

CAMPO seeks to provide opportunities in the transportation planning process to interested parties as well as engage and involve members of the community who have not been traditionally involved. Transportation decisions are ultimately more responsive to local needs as a result of the public participation process. Public engagement provides decision-makers with relevant, applicable information prior to decision-making, and provides the public an opportunity to raise concerns and share perspectives that can be considered with discussion of technical, political and economic issues. The purpose of this plan is to provide a framework from which to guide the public participation process in future transportation planning projects at CAMPO, such as the regular meetings of the CAMPO Executive Board and Transportation Coordinating Committee, as well as the core documents of the 3C process mentioned at the beginning of this section.

This plan specifies CAMPO's underlying goals as well as strategies and techniques to be considered and employed in achieving the goals of the public participation process. The plan describes the importance of environmental justice and provides a framework for including it as a part of the public participation process. Additionally, the plan describes how CAMPO will work to incorporate new practices such as visualization and scenario planning techniques into its public participation process to better communicate with stakeholders and the public.

CAMPO Vision Statement

The region has a common vision of what it wants its transportation system to be:

- a seamless integration of transportation services that offer a range of travel choices and are compatible with the character and development of our communities, sensitive to the environment, improve quality of life and are safe and accessible for all.

The 2045 Metropolitan Transportation Plan (MTP) commits our region to transportation services and patterns of development that contribute to a distinctive place where people can successfully pursue their daily activities.

Legal Framework and Plan Application

The Fixing America's Surface Transportation Act (FAST Act), was signed into law on December 4, 2015, and contains specific language outlining federal requirements regarding public involvement processes and procedures. In general, the FAST Act built upon previous transportation legislation (ISTEA, TEA-21, SAFETEA-LU, and MAP-21) to provide states and metropolitan planning organizations specific direction in conducting and promoting broad-based public involvement activities.

The FAST Act (Public Law 114-94) requires metropolitan planning organizations to provide citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities,



MAP-21 Signed into Law (Streetsblog USA)

representatives of the disabled, and other interested parties with a reasonable opportunity to comment on the transportation plan.

In addition, the Public Participation Plan:

- shall be developed in consultation with all interested parties; and
- shall provide that all interested parties have reasonable opportunities to comment on the contents of the transportation plan.

In carrying out these required elements of the Public Participation Plan, CAMPO shall, to the maximum extent practicable:

- hold any public meetings at convenient and accessible locations and times;
- employ visualization techniques to describe plans; and,
- make public information available in electronically accessible format and means, such as the internet, to afford reasonable opportunity for consideration of public information.

Federal legislation requires MPOs to produce documents that govern the regional transportation investments and planning activities, including the development of the Unified Planning Work Program, the Long-Range Transportation Plan, the Transportation Improvement Program, and the Public Participation Plan. This plan will apply to all these activities.

Acronyms

There are some common acronyms used throughout this document to reference the plans and documents, including the following not already covered in the introduction:

- | | |
|--|--|
| • Air Quality Conformity Determination (AQCD) | • Strategic Prioritization Office (of) |
| • Congestion Management Program (CMP) | Transportation (SPOT) - refers to prioritizing |
| • Comprehensive Transportation Plan (CTP) | projects for the TIP |
| • Locally Administered Projects Program (LAPP) | • Transportation Improvement Program (TIP) |
| • Metropolitan Transportation Plan (MTP) | • Unified Planning Work Program (UPWP) |

MTP Goals Related to the PPP

The 2045 MTP update, adopted by the Executive Board in February 2018, includes goals and objectives related to Environmental Justice (EJ) and Community Values that relate directly to this plan and the related plans in the appendices. The approved goals and objectives from the adopted 2045 MTP are below, and can be found on the [CAMPO website](#):

Goal: Ensure Equity and Participation

This directly aligns with improving quality of life for the community and Social and Equity measures. Indirectly, it benefits the safety and security of non-motorized users.

The objectives under this goal are

- a) Ensure that transportation investments do not create a disproportionate burden for any community, and
- b) Enhance public participation among all communities.

Environmental Justice

The intent of environmental justice is to avoid, minimize, or mitigate disproportionately high and adverse effects on minority and low-income populations; and ensure the full and fair participation by all potentially affected communities in the transportation decision-making process. Environmental justice addresses fairness toward the disadvantaged and addresses the possible exclusion of racial and ethnic minorities, low-income people, the elderly, and persons with disabilities or communication barriers from decision-making. The federal government has identified environmental justice as an important goal in transportation, and local and regional governments must incorporate environmental justice into transportation planning. Capital Area MPO goals that relate to the public transportation e transportation planning process, including those processes for the long-range transportation plan, transportation improvement program, and specific project planning.

Even though the term “environmental justice” is not in federal legislation, the concept and its application have been developed through a succession of court cases, transportation regulations, agency memoranda, and Executive Orders. Much of the legal application is based on Title VI of the Civil Rights Act of 1964 that provides protection from discriminatory actions or results from federal, or federally assisted or approved, actions. In terms of transportation planning, environmental justice seeks to ensure that the disadvantaged:

- 1. Have access to the decision-making process;
- 2. Realize benefits from investments that are commensurate with the population as a whole;
- 3. Do not shoulder a disproportionate share of the negative effects and burden resulting from the implementation of transportation projects; and,
- 4. Do not incur a disproportionate share of the financial cost.

For the development and adoption processes of the 2045 MTP, CAMPO and DCHC MPO carried out a comprehensive and thorough set of activities to ensure that disadvantaged persons, as characterized in federal regulations, do not suffer discrimination in e public participation and plan analysis. A description of the environmental justice activities that occurred can be found in the full report on the [CAMPO website \(www.campos-nc.us\)](#). Also, as part of the full 2045 MTP report, detailed maps are contained in the Appendices.

HOW TO GET INVOLVED IN TRANSPORTATION PLANNING



CALL US

919-996-4000 during normal business hours 8:00 a.m. to 4:30 p.m. Monday through Friday



WRITE TO US

Capital Area Metropolitan Planning Organization One City Plaza
421 Fayetteville Street, Suite 203
Raleigh, NC 27601



EMAIL US

General Inquiries: comments@campo-nc.us
Public Involvement/Media/Website/Social Media: Bonnie.Parker@campo-nc.us
Title IV/Limited English Proficiency: Bonnie.Parker@campo-nc.us



VISIT OUR WEBSITE

<http://www.campo-nc.us/>



FOLLOW US ON SOCIAL MEDIA

On Twitter [@CapitalAreaMPO](https://twitter.com/CapitalAreaMPO)
On Facebook at [NC Capital Area MPO](https://www.facebook.com/NC-Capital-Area-MPO/)
LinkedIn at [NC Capital Area MPO](https://www.linkedin.com/company/nc-capital-area-mpo/)
Instagram at [nccapitalareampo](https://www.instagram.com/nccapitalareampo/)



COME TO AN EVENT

The CAMPO participates in special events throughout the planning area and hosts workshops for the public to learn about projects where they work and live. Visit the CAMPO website (above) to view opportunities.



PARTICIPATE IN PERSON

Make a public comment at a CAMPO board or committee meeting OR
Visit CAMPO, One City Plaza, 421 Fayetteville Street, Suite 203, Raleigh, 27614

Summary Table of Public Participation

CAMPO follows agency organization and operation policies that provide specific guidelines for public records and public access (see appendices). CAMPO policies are adopted or amended after 10 days public notice.

SUMMARY TABLE OF PUBLIC PARTICIPATION					
Meeting/ Program Item Type	Body/Document	Frequency	Comment Period	Public Notice	Public Access
OPEN MEETINGS					
Governing Body	Executive Board	Monthly	at every meeting	in accordance with NCGS Open Meetings Law	<ul style="list-style-type: none"> Agenda posted in advance on CAMPO website Opportunity at each meeting; content is open but Chair may specify time length to accommodate numerous commenters Summary of advance public comments provided in writing Meeting Calendar posted at venue
Committees	TCC	Monthly			
	Ad Hoc Area Planning and Corridor Study Committees	Varies by Plan			
	Standing Subcommittees	As needed			
Workgroups	Standing and Ad-hoc Staff and Professional Workgroups	As needed	Not Applicable	Not Applicable	Not Applicable
Meeting/ Program Item Type	Body/Document	Frequency	Comment Period	Public Hearing Notice	Public Access
PROGRAM ADOPTION					
Plans and Program Adoption	CTP/MTP	Every 4 years	42 Days	14 Days	<ul style="list-style-type: none"> Legal advertisement in newspaper of record during the Comment Period. Posted on website with public notices Hard copies available Advance comments documented for review Opportunity for comment at plan-specific meetings prior to adoption and at meetings where considered/adopted
	TIP/SPOT	Every 2 years	30 Days		
	LAPP	Annually	See LAPP Handbook	14 Days	<ul style="list-style-type: none"> Posted on website with public notices Hard copies available Advance comments documented for review Opportunity for comment at plan-specific meetings prior to adoption and at meetings where considered/adopted
	AQCD	Every 2 years for TIP; Additional if MTP not on same schedule	30 Days		
	CMP	Every 4 Years	30 Days		
	UPWP	Annually	30 Days		
	PPP	Annually with UPWP	45 Days	14 Days	<ul style="list-style-type: none"> Varies by study; will generally include website and meetings in the study area.
	Special Studies	As Needed	Ongoing during study	Not Applicable	

Meeting/ Program Item Type	Body/Document	Frequency	Comment Period	Public Hearing Notice	Public Access
Plans & Program Adoption (cont.)	Wake Transit Vision Plan Update	Every 4 years	40 Days	14 Days	<ul style="list-style-type: none"> Posted on CAMPO website with public notices; hard copies available, advance comments documented for review Posted on the Wake Transit and/or TPAC website Public Hearing will be a joint public hearing with CAMPO Executive Board and GoTriangle Board of Trustees and must be held at least 14 Days prior to action to adopt by either board. Opportunity for comment at meetings where considered/adopted.
	Wake Transit Annual Work Plan	Annually	30 Days	7 Days	<ul style="list-style-type: none"> Posted on CAMPO website with public notices; hard copies available, advance comments documented for review Posted on the Wake Transit and/or TPAC website Opportunity for comment at meetings where considered/adopted.
Modifications (Plan and Program Amendments)	CTP/MTP	As needed	30 Days	N/A	<ul style="list-style-type: none"> Posted on website with public notices; hard copies available Advance comments documented for review Opportunity for comment at meetings where considered/adopted
	TIP/SPOT				
	AQCD ¹				
	CMP				
	UPWP				
	PPP	As needed	45 Days ¹	14 Days	
Technical Corrections (Plan and Program Administrative Modifications)	CTP/MTP	As needed	At meeting where item is being discussed	N/A	<ul style="list-style-type: none"> Agenda posted in advance on CAMPO website Opportunity at each meeting; content is open but Committee Chair may specify time length to accommodate numerous commenters Summary of advance public comments provided in writing
	TIP/SPOT				
	AQCD				
	CMP				
	UPWP				
	PPP				

¹ 23 CFR 450.316 - Interested parties, participation, and consultation requires 45 calendar Days.

Documents

The Capital Area MPO is responsible for three primary documents to implement the 3C (comprehensive, cooperative, and continuous) process: the Metropolitan Transportation Plan, the Transportation

Improvement Program, and the Unified Planning Work Program. In addition, CAMPO has a Public Participation Plan (this document) that covers those three primary documents. There are also two documents that are the charter of the MPO, the Memorandum of Understanding (MOU) and Prospectus.

Metropolitan Transportation Plan (MTP)

Updated at least every four years, the Metropolitan Transportation Plan is the long-term, financially constrained, multimodal transportation plan for the region. It includes policies, programs and projects for development that respond to adopted goals, and it guides expenditures of state and federal funds during the next 20 or more years. It is the product of a comprehensive, cooperative and continuous planning effort. Transit, highway, local roadway and bicycle and pedestrian projects are among projects included in the MTP. During its development, transportation investment priorities and major planning-level project design concepts are established. Broad regional impacts of transportation and the environment are addressed.

This is an early and important opportunity for the public and stakeholders to help define and influence transportation in the region. As such, numerous outreach and communications strategies are implemented to engage a diverse audience in public input opportunities. Strategies may include but are not limited to print and online surveys, stakeholder workshops, website content, media outreach, e-mail and mail notices, presentations to community groups and public meetings for both the development of the MTP and review of its final recommendations prior to consideration for governing board approval. Public comments on the MTP will be included in the documentation of the plan or by reference to the Transportation Conformity documentation.

Changes to the MTP are incorporated through an update, amendment or administrative modification, and public input opportunities correspond to the level of proposed changes.

A **Plan Update** is a complete review of the MTP that addresses new demographics or changes to the overall timeframe for the plan. Project changes, additions or deletions may also be part of an update.

Amendments: An amendment involves a major change to a project, including the addition or deletion of a project or a major change in project cost, project/project phase initiation dates, or a major change in design concept or design scope (e.g., changing project termini or the number of through traffic lanes). Changes to projects that are included only for illustrative purposes do not require an amendment. An amendment is a revision that requires public review and comment, redemonstration of fiscal constraint, or a conformity determination when applicable.

Modifications Administrative modification means a minor revision that includes minor changes to

Metropolitan Transportation Plan (MTP)

- Details comprehensive plan for transportation modes
- Includes long and short-range goals and strategies
- Identifies funding sources and estimates costs
- Provides framework for choosing transportation projects

Adopted: **Every four years**

Amended: **As needed**

See Summary Table of Participation for Access, Notice, and Comment Periods

project/project phase costs, minor changes to funding sources of previously-included projects, and minor changes to project/project phase initiation dates. An administrative modification is a revision that does not require public review and comment, redemonstration of fiscal constraint, or a conformity determination (in nonattainment and maintenance areas).

Transportation Conformity

The region's long- and short-range transportation plans, the MTP and Transportation Improvement Program, must comply with federal air quality regulations because the Raleigh-Durham area was designated by the EPA as nonattainment for the pollutant ozone. The Transportation Conformity analysis documents that the total ozone-causing pollution expected from all of the region's planned transportation projects are within limits established in the State Implementation Plan. The analysis incorporates, among many factors, the expected completion date of transportation projects. The draft conformity determination of the MTP and TIP and supporting documentation shall be made available at the related public meetings.

Congestion Management Process (CMP)

A Congestion Management Plan (CMP) is a management system and process used by an MPO to improve traffic operations and safety by using strategies that reduce vehicle miles traveled during peak commuting hours and provide other congestion relief. A CMP usually identifies low-cost improvements with short timeframes (5-10 years), where traditional projects (lane additions etc.) can cost significantly more and have longer implementation timeframes. It follows the same requirements as the MTP.

Transportation Improvement Program (TIP)

As projects listed in the MTP move closer to implementation, they are added to the Transportation Improvement Program, a comprehensive, multi-year list of funded transportation projects. The TIP lists projects with committed funds from federal, state and local sources. In North Carolina, the TIP is generally updated on a 2-year cycle.

Changes to the TIP are incorporated through an update, amendment or administrative modification, and public input opportunities correspond to the level of proposed changes.

Air Quality Conformity Determination (AQCD)

- Done as part of MTP and TIP, including applicable amendments
- May have its own public notice along with the other plan involvement
- Affects the MTP update cycle and interim year data needs
- Plans must demonstrate “conformity”

Adopted: **Every four years for MTP/Every two years for TIP**

Amended: **As needed**

See Summary Table of Participation for Access, Notice, and Comment Periods

Congestion Management Process (CMP)

- Looks for smaller, short-term solutions
- Reviews congestion as the primary concern
- Helps inform the MTP

Adopted: **Every four years**

Amended: **As needed**

See Summary Table of Participation for Access, Notice, and Comment Periods

A **Plan Update** is a complete review of the TIP that addresses fiscal changes either to the overall amount of funding, funding allocation, or project cost. It can also include other project changes, and addition or deletion of projects.

Amendments: An amendment involves a major change to a project, including the addition or deletion of a project or a major change in project cost, project/project phase initiation dates, or a major change in design concept or design scope (e.g., changing project termini or the number of through traffic lanes). Changes to projects that are included only for illustrative purposes do not require an amendment. An amendment is a revision that requires public review and comment, redemonstration of fiscal constraint, or a conformity determination when applicable.

Modifications: Administrative modification means a minor revision that includes minor changes to project/project phase costs, minor changes to funding sources of previously-included projects, and minor changes to project/project phase initiation dates. An administrative modification is a revision that does not require public review and comment, redemonstration of fiscal constraint, or a conformity determination (in nonattainment and maintenance areas).⁵

Program of Projects (PoP)

The Program of Projects is required for transit agencies by the Federal Transit Administration (FTA); MPOs approve as a partner. This is generally as part of the TIP and TIP Amendment process with specific FTA-required language as needed.

Transportation (Special) Studies

Periodically, CAMPO undertakes specialized studies to address specific modes, issues, target areas, or corridors. These studies are included and funded as part of the UPWP and advance specific goals, strategies or projects included in the MTP. Frequently, the results of a specialized study lead to the development of a project or multiple projects that are advanced through the TIP. These studies help identify broad issues, concerns, and desires that might be relevant to a specific segment of the population or to a particular geographic area within the county. Each study has a specific public engagement and outreach plan to involve the appropriate participants and stakeholders.

Transportation Improvement Program (TIP)

- A list of projects with committed funding in the next 5 years
- A list of projects with high likelihood of funding in the next 6-10 years
- Provides an implementation schedule for each project listed
- Becomes part of the Statewide TIP

Adopted: **Every two years**

Amended/Modified: **As needed**

See Summary Table of Participation for Access, Notice, and Comment Periods

Transportation Studies

- Modal studies such as transit or bicycle and pedestrian
- Data collection and analysis for traffic management
- Sub-area, road, intersection, or corridor studies
- Specialized studies to advance the MTP goals

Adopted: **Endorsed (rather than adopted) for use in future MPO planning and programming activities**

Amended: **As needed**

See Summary Table of Participation for Access, Notice, and Comment Periods

⁵ CFR §450.104 Definitions.

Prioritization

Prioritization is a two-step process in terms of public involvement. The first step selects projects to submit to NCDOT for quantitative analysis on criteria set in NCGS Chapter 136 Article 14B (§136-189.11). The second step uses the quantitative data as one part of prioritizing which projects are given additional weight by the MPO to make them competitive for funding in the statewide, regional, and divisional funding categories. Both steps involve a 30-day public comment period and a public hearing by the Executive Board. For more information on prioritization see the CAMPO adopted prioritization methodology at <http://www.campo-nc.us/funding/spot>.

Unified Planning Work Program (UPWP)

The Unified Planning Work Program for Regional Transportation Planning provides a summary of the transportation and related air quality planning tasks conducted by the MPO. It is developed annually and serves as a guide for transportation and air quality planning activities to be conducted over the course of specified fiscal years. Included in the UPWP are detailed descriptions of the transportation and air quality planning tasks with a summary of the amount and source of funds to be used. The UPWP is developed in cooperation with the North Carolina Department of Transportation, transportation authorities, toll authorities and local governments in the Research Triangle region. Specific planning needs for the region are identified through requests solicited from representatives of these agencies. This information is combined with regional needs identified by CAMPO, and after allocating funds from available resources, presented as a proposed Work Program for the upcoming fiscal years. The UPWP is modified periodically to reflect new initiatives, project modifications and funding adjustments.

The UPWP adoption has a higher level of public involvement, while amendments and modifications are handled on a case-by-case basis based on the scope and impact of the change.

Unified Planning Work Program (UPWP)

- A list of work tasks to be completed by CAMPO
- Defines work products and timeline for major activities
- Proposes budget using federal aid and other funds
- Estimates costs for each task

Adopted: **Annually**

Amended/Modified: **As needed**

See Summary Table of Participation for Access, Notice, and Comment Periods

Transit Narrative for UPWP

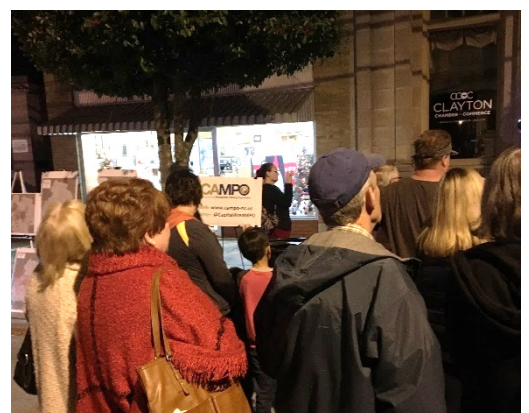
Included in the UPWP process

5-Year Plan

Included in the UPWP process

Locally Administered Projects Program (LAPP)

The Locally Administered Projects Program is used to award funding to projects that use federal funds CAMPO administers directly. There is an annual call for projects, a technical scoring process, and a final selection committee. There are multiple public involvement



opportunities; for additional information see the current LAPP Handbook or the LAPP section of the CAMPO website at: <http://www.campo-nc.us/funding/locally-administered-projects-program>.

Wake Transit Plan Implementation

In November 2016, voters in Wake County approved a local ½ cent option sales tax, paired with other local, federal, and state revenues to fund public transit improvements in Wake County. Additional information about the Wake Transit Plan can be found at www.goforwardnc.org/wake. The Plan will be implemented over the next 10 years, and beyond. As a new funding source, responsibility for implementation of the Wake Transit Plan has been assigned to the governing boards (the CAMPO Executive Board and the GoTriangle Board of Trustees).

Wake Transit Annual Work Plan - Governing Board Approvals

- Outlines organizational structure and work products for the next fiscal year.
- Offers opportunities for public participation

Adopted: **Annually**

Amended/Modified: **Annually**

See Summary Table of Participation for Access, Notice, and Comment Periods

The Wake Transit Governance Interlocal Agreement (Governance ILA) established a staff-level advisory committee to coordinate planning and implementation of the Wake Transit Plan, known as the Wake County Transit Planning Advisory Committee (TPAC). The TPAC is comprised of representatives from regional and local governments as well as Wake County transit providers (GoTriangle, City of Raleigh, GoCary and GoWake Access) and major institutions. In early 2019, the governing boards adopted a Public Engagement Policy for Wake Transit implementation. Requirements included in that policy are applicable to projects that have a Wake Transit capital, operating, or special agreement, as well as specific items listed in the Governance ILA including the Wake Transit Annual Work Plan and the update to the Wake Transit Vision (10-Year) Plan. Any item requiring adoption or approval by either of the governing boards, or another entity such as a local municipality, will adhere to any public engagement standards that entity may have. In the case of CAMPO, for Wake Transit items that go to the Executive Board for approval or adoption, this Public Participation Policy will be followed for public engagement related activities. As outlined in the summary table, CAMPO will hold public comment periods and public hearings for both the Wake Transit Annual Work plan and the Wake Transit Vision Plan Update approvals.

Public Participation Plan (PPP) (this plan)

The PPP is a blueprint for action to involve the public in transportation planning. It provides a guide for public access to and involvement with the CAMPO planning process. All CAMPO planning work products, as well as major amendments to adopted plans and programs, must follow the requirements outlined in the PPP.

CAMPO continuously seeks opportunities for all members of the community to participate in planning, reviewing,

Public Participation Plan (PPP)

- Outlines organizational structure and work products
- Describes CAMPO public communication tools
- Prescribes public comment periods
- Offers opportunities for public involvement

Adopted Previously: 2016;

Amended August 2019

Amended/Modified: **As needed**

See Summary Table of Participation for Access, Notice, and Comment Periods

and implementing its transportation projects and programs. The PPP is reviewed annually and updated as needed to reflect changes in local, state, or federal legislation, to adjust the plan to include new technologies, and to adjust the plan to meet the needs of the community. Public input during the development of the PPP is essential to ensure the process provides full and open access to all.

Title VI/Environmental Justice/Low Income/Minority Plan

Covered as part of PPP for the purposes in this plan.

Limited English Proficiency Plan (LEP)

Covered as part of PPP for the purposes in this plan.

Merger (NEPA)

The NEPA process is managed by NCDOT and not the MPO. MPO staff participate at a technical level.

Coordinated Public Transportation and Human Services Transportation Plans

These plans are developed by the county or system and are not an MPO plan. MPO staff participates at a technical level.

Community Transportation Services Plans

These plans are developed by the county or system and are not an MPO plan. MPO staff participates at a technical level.

Americans with Disabilities Act (ADA) Compliance Plans

Fixed-route transit systems are required to evaluate whether disabled persons can reasonably access fixed route service. For those persons who cannot be served by traditional, fixed transit routes, a plan for alternative access is required by the FTA and the ADA. The MPO does not develop these plans, but must certify them. Currently GoRaleigh, GoTriangle, and GoCary are subject to this requirement.

Prospectus

The Prospectus is primarily a reference document for the transportation planning staff. Its purpose is to provide sufficiently detailed descriptions of work tasks so that staff and agencies responsible for doing the work understand what needs to be done, how it is to be done, and who does it. A secondary purpose of the Prospectus is to provide sufficient documentation of planning work tasks and the planning organization and procedures so that documentation is minimized in a required annual Unified Planning Work Program (UPWP). Signatories to the document are the MPO, NCDOT, the NC Department of Environmental Resources (NCDER), USEPA, and FHWA.

Memorandum of Understanding (MOU)

The MOU is the agreement between the state of North Carolina, the federal government, and the local governments, authorities, and agencies that make up the MPO. It defines membership, voting ability and weighted voting procedures, board and committee structure, and the basic operating rules for the MPO.

Meetings

Every public meeting held by an official CAMPO board, committee, or subcommittee will meet or exceed the requirements of North Carolina Open Meetings Laws, and will include the following:

ADVANCE NOTICE

Notice of meetings will be available on the CAMPO website to meet or exceed the notice requirements of the North Carolina Open Meetings Law. Regular meetings will have a calendar posted at the meeting venue in accordance with the same law. Emergency meetings, should they ever be needed, will follow the emergency meetings requirements of the law, as well.

AGENDA

A meeting agenda is part of the advance public notices for CAMPO governing board and committee meetings. Agendas list the items in the order they will be discussed, provide additional detail about the meeting, and highlight specific actions to be considered. Members of the public can make a request to have an item placed on the agenda by sending a written notice to CAMPO at least 14 days in advance.

PUBLIC COMMENT

Public comment periods are included at the beginning of each TCC and Executive Board meeting. Members of the public may be heard regarding items not on the agenda during that part of the meeting, or may be heard regarding specific agenda items during the discussion on a particular item.

MEETING NOTICE REQUIREMENTS

- The date, time, and place of the event.
- A brief description of the purpose of the event.
- A brief list of any items on which action may be taken at the event.
- The address and phone number where individuals can get meeting information and a copy of the agenda.
- Information about how to get a record of the meeting as stated in North Carolina General Statute §143-318, Article 33, Meetings of Public Bodies, commonly known as the Open Meetings Law.
- If held solely electronically, post on the MPO's website the meeting's electronic location and means and instructions where the public may watch a livestream and/or listen to the meeting.
- Contact information for persons with disabilities needing special accommodations to participate in the proceeding in accordance with the Americans with Disabilities Act and North Carolina General Statute §143-318, Article 33, Meetings of Public Bodies.

ACCESS FOR PEOPLE WITH SPECIAL NEEDS

All CAMPO meetings are held in facilities accessible to persons with disabilities and to people who use public transit. People needing special accommodations to participate in CAMPO meetings or who need free translation services can contact the MPO Office 48 hours in advance. Instructions for receiving assistance are included as part of the meeting notice.

ELECTRONIC MEETINGS

MPO meetings may be solely held online, or electronically. In such instances, the MPO must take reasonable steps to make the meetings publicly accessible by other means and in accordance with the North Carolina Open Meetings Law.

To the extent feasible:

- Meetings should be streamed live on an online platform that allows the public to see and hear the meetings.
- A phone number should be provided so that people without internet access can call to listen to the meetings.
- Meeting agenda, materials, and presentations should be posted online in advance of the meeting.
- If public comments can't be made in person, provide means for people to provide their comment by phone call, email, or video. The deadline for public comments should be no sooner than 48 hours prior to the meeting.

ON EVERY CAMPO MEETING AGENDA:

The Capital Area MPO coordinates transportation planning in Wake County and portions of Franklin, Granville, Johnston, and Harnett counties. Members of the public are encouraged to speak at both the Executive Board and the Technical Coordinating Committee meetings. There is an opportunity for public comment at the beginning of each meeting. When speaking, please tell us your name and place of residence; please limit comments to three minutes per speaker.

In compliance with the Americans with Disabilities Act (ADA), accommodations will be provided for persons who require assistance in order to participate in the N.C. Capital Area MPO's meetings. If assistance is needed or to request this document in an alternative format, please contact the MPO's office at 919-996-4400 (voice), 919-996-1736 (fax), or 800-735-2962 (TTY) and request a connection to the City of Raleigh Communications Department at least 72 hours in advance of the meeting.

It is the policy of CAMPO to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Orders 12898 and 13166, and related nondiscrimination statutes and regulations in all programs and services. It is the MPO's policy that no person in the United States shall, on the grounds of race, color, sex, age, income status, national origin, or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program, activity, or service for which CAMPO receives Federal financial assistance. If you feel you have been subjected to discrimination, you may file a complaint by contacting the CAMPO Title VI Coordinator at 919-996-4400.

Online Public Participation Guidelines

The following Online Public Participation Guidelines applies to all online platforms used by the Capital Area MPO. The MPO uses online participation as a limited public forum for stakeholders and members of the community to conduct orderly and civil discourse. To promote that objective, we try to monitor, but cannot take responsibility for, all postings and comments. We ask that comments and/or postings be clean, respectful and truthful. When using our online platforms, we want people to feel safe in expressing diverse opinions and beliefs. Therefore, material that the MPO determines is in violation of this policy, including unlawfully disseminated materials or postings that constitute a possible crime in North Carolina, makes threats; abuses, or harasses or seeks to intimidate others; uses fear or disseminates misinformation, may be removed or archived.

Covered Materials

Materials covered by this policy include not just comments or postings, but also images and links to other sites. In all instances, users must also comply with the Online Public Participation policy – and also comply with the Terms of Use of any host platform (e.g. Facebook, Twitter, etc.). All social media platforms are subject to the laws of North Carolina.

Information on the CAMPO website (www.campo-nc.us) and any of the MPO's online platforms/tools is posted in good faith by MPO staff with the intention of providing timely and accurate information for Executive Board and Technical Coordinating Committee members, agency and regional partner organizations and other key stakeholders, as well as the broader public.

Postings on Behalf of CAMPO

Contractors and consultants who have entered into a contract with CAMPO may only edit the MPO's website, social media platforms, or other public participation platforms/tools with which the MPO has an agreement or is a licensed user, with express written approval, and in advance of each instance.

Calendar of Events

The intent of the web calendars is to provide timely and accurate information on events of interest to area residents, visitors and businesses. The calendar is limited to community events occurring within the CAMPO boundaries and regional events of governmental interest. Events hosted by businesses solely for commercial purposes are not eligible for inclusion. By using the information contained herein, the viewer willingly assumes all risks in connections with such use. The Capital Area MPO staff may add, modify, or delete any information on this calendar at any time.

Participant Registration

The MPO reserves the right to require registration, while not permitting multiple registrations or logins. Participation may be limited to CAMPO Area residents or business representatives. Registration information is retained under the privacy provisions of this policy and you may use these platforms only in compliance with this policy.

Postings and Removals/Archiving

The individual user is responsible for their use of these tools and for any content they provide, including compliance with applicable laws, rules and regulations and this policy. Noncompliant postings may be removed and archived. The MPO does not restrict viewpoints. The MPO may, in its sole discretion, post or remove and archive postings on any of its social media platforms, websites, blogs, mobile apps or other services. By participating in these online opportunities, the MPO expects postings, comments and materials to

further the mission of these online participation tools. Accordingly, postings should **not**:

- Promote an unlawful purpose or scheme.
- Contain personally identifiable information about others, impersonate someone else, defame or slander another or contain altered images.
- Endorse or seek to boycott companies, brands, political platforms, specific groups or candidates.
- Violate the expectations of civil discourse, civility and constructively informing government operations.
- Contain profane or graphic content, such as content that is vulgar, incites violence or is sexually explicit.
- Offer misleading or false information.
- Contain spam or promote technical abuse, including computer viruses or code which may disrupt, damage or restrict the use of any computer software, hardware or telecommunications equipment.
- Advocate or depict illegal activity.
- Target, disparage or discriminate against any individual.
- Target disparage or discriminate against any ethnic, racial, religious, gender or other protected class
- Objectively appear to be an attack or threat on an individual or public figure. Threats, as well as hate speech that the MPO determines are credible will be removed and may be referred to law enforcement.
- Bully, harass or intimidate – including messages or content generally available to the public (such as text, links, images or photos) that appears to purposefully target individual.
- Promote or endorse private business ventures, services or products.
- Engage in fundraising or campaigns for public office or promote a political organization or candidate.
- Infringe on copyrights or trademarks or intellectual property rights of others.
- Access or search, or attempt to access or search, the MPO's services (automated or otherwise) other than through our currently available, public-facing website and related platforms.
- Post advertisements, solicitations, GOFUNDME links and "For Sale or Rent" postings are not permitted.

Disclaimer

Comments, postings, and links from non-MPO sources that appear on the MPO's sponsored social media or digital media sites (or links within those comments or postings) do not reflect views or act as an endorsement by the MPO of specific viewpoints, policies, practices, or products.

Personal Information

The Capital Area MPO is committed to ensuring the security of personal information voluntarily submitted to the website and the privacy of information collected through website logs in accordance with this Online Public Engagement Policy.

Social media platforms are not confidential. Users should be careful about any personal information they post. We encourage users NOT to post birthdates, social security numbers, information about children, etc. as any information posted is accessible by the general public and may be subject to the provisions of the North Carolina Public Records Law.

The Capital Area MPO will not sell, rent or lease or otherwise disclose personally identifiable information. Information may be shared with entities who are contractually acting on behalf of the MPO. Such entities are governed by this privacy policy with respect to the use of this data and are bound by the appropriate confidentiality agreements.

Legal Access to Personal Information

Federal law enforcement officials may under certain circumstances obtain access to subscriber databases and archived information under the federal Patriot Act (Public Law 107-56). Federal law prohibits the Capital Area MPO from informing you if federal law enforcement officials have obtained these records.

Notwithstanding any other statements or representations here or elsewhere on the CAMPO website or other online platforms, CAMPO reserves its right to disclose any information in its possession if it is required to do so by law, including the North Carolina Public Records Law and North Carolina Open Meetings Law, or if it believes, in good faith, that such a disclosure is necessary to comply with the law, defend its rights or property, or to respond to an emergency situation.

Contact Us

Comments and questions are welcome at any time, but typically comments and postings are monitored only during regular business hours. Specific questions submitted through our social or digital media platforms are not guaranteed a response. For questions or inquiries, please also use the CAMPO website's contact form.

“Contact us” is the primary means of communication with staff for a website visitor. Questions, comments and suggestions voluntarily submitted to the CAMPO website through electronic mail may be treated as non-confidential and non-proprietary. Email communication is directed to appropriate staff. The information will only be maintained as an active file as long as needed to respond to the request. However, information may be archived for historical purposes, but will not be used beyond the stated purpose of the communication and will not be shared or distributed to third parties with any identifiable personal information.

Website Logs

Website logs are used to provide use data for analysis. The logs do not contain personally identifiable information and no attempt is made to link the logged information with the individuals who browse the site. By using the CAMPO website, browsers give CAMPO permission to collect such information about them as an anonymous user for the purpose of calculating aggregate site statistics.

Use or Reuse of Information

Information may be printed or downloaded from the website for non-commercial, personal use only, provided all copyrights, licenses and other proprietary notices contained on the material are retained. The CAMPO logo should not be reused without explicit written permission. No person may sell, distribute, modify, transmit, reuse, repost, use or create derivative works based on the content of the website in whole or part for any purpose without the written permission in each instance from CAMPO staff or the owner of such content.

Updates to Guidelines

The Online Public Participation Guidelines will be reviewed and updated as a part of CAMPO's Public Participation Plan.

Strategic Plan Goals Related to the PPP

CAMPO updated its strategic plan in early 2015, and it includes elements that are relevant to the PPP. Four strategic focus areas were identified that will help create an environment where regional transportation needs are prioritized and understood and CAMPO will achieve its vision:

1. *Public engagement and education*
2. *Partnering with others*
3. *Educating elected officials*
4. *Policy leadership*

Performance Measures

The 2015 Strategic Plan Update has measures related to the Public Engagement and Education. The MPO shall endeavor to collect this information for each public outreach activity and event sponsored by the MPO.

Public engagement and education

Potential Success Measures:

- *Number of citizens participating (new voices)*
- *Number of workshops/workshop attendees held*
- *Number of press releases*
- *Number of unique website visitors*

TITLE VI, MINORITY, LIMITED ENGLISH PROFICIENCY (LEP), AND LOW INCOME

PUBLIC OUTREACH PLAN



Author - Paul Black

11-16-2016

Updated 12-5-2018 Crystal Odum/Bonnie Parker

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TITLE VI POLICY STATEMENT AND NOTICE OF NONDISCRIMINATION

U.S. Department of Justice regulations, 28 Code of Federal Regulations, Section 42.405. It is the policy of the **Capital Area Metropolitan Planning Organization (CAMPO)**, as a federal-aid recipient, to ensure that no person shall, on the ground of **race, color, national origin, limited English proficiency, sex, age, or disability, (and low-income, where applicable)**, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of our programs and activities, as provided by Title VI of the Civil Rights Act of 1964, Executive Orders 12898 and 13166, the Civil Rights Restoration Act of 1987, and other pertinent nondiscrimination authorities.

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

Bonnie Parker
One City Plaza
421 Fayetteville Road, Suite 203,
Raleigh, N.C. 27601
(919) 996-4400
Bonnie.Parker@campo-nc.us

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

Implementation (Dissemination)

- This Policy Statement contains contact information for the Title Coordinator, and it will also serve as our notice to public.
- This statement will be signed by the 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 on office bulletin boards, near the receptionist's desk, in meeting rooms, and disseminated within brochures and other written materials.
- The statement will be incorporated into Title VI training and 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.

Chris Lukasina, Executive Director

December 5, 2018

INTRODUCTION

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

Title VI refers to the section of the Civil Rights Act of 1964 that states:

"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."

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 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)

Taken together, these requirements define an over-arching Title VI/Nondiscrimination Program.

"Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, 1994

In 1997 the U.S. Department of Transportation issued its final order (DOT Order 5610.2a, updated in 2012) which specifically addressed environmental justice for minorities and low income populations with the intent to ensure that all federally funded transportation projects/programs do not bring disproportionately high or negative impacts on these populations.

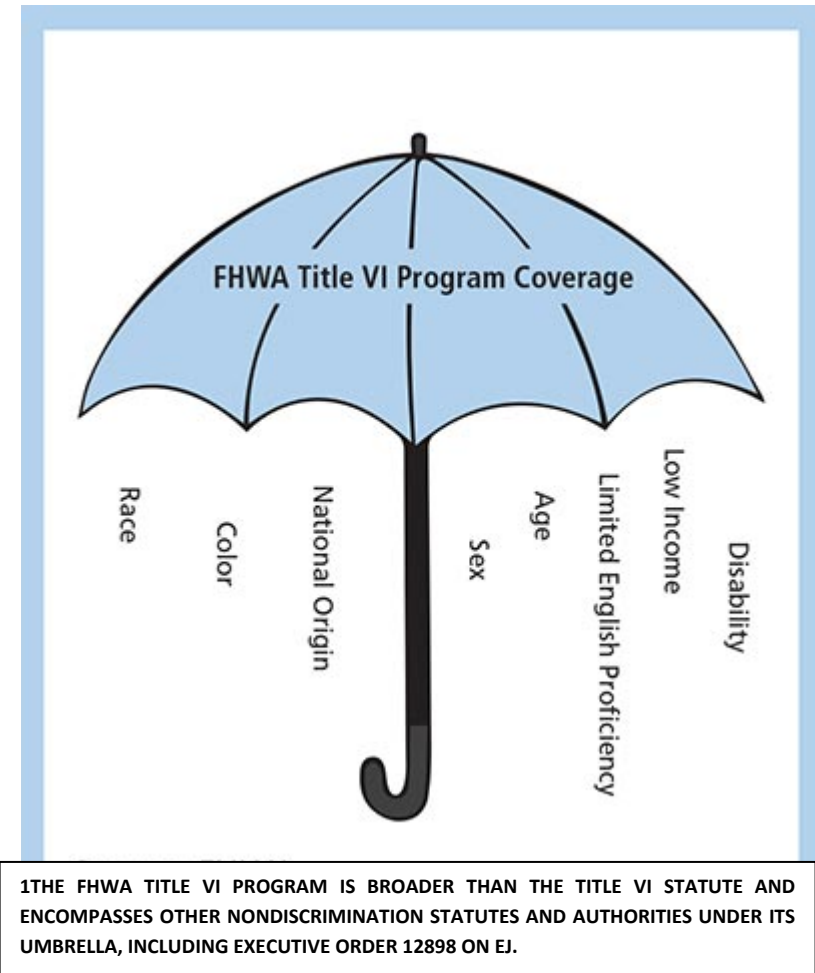
Many people in minority and low-income communities have traditionally been underserved by conventional outreach methods. People may be unable to attend public events if they do not own a car, if they cannot afford childcare, or if they work late shifts or more than one job.

CAMPO will seek and consider the needs/interests of individuals, groups, and communities that are traditionally underserved by the transportation system policies and investments. The following are representative of public involvement CAMPO uses:

- ✓ Provide ample opportunity through effective public notices and outreach activities to engage this segment of the population or their respective representation in the early planning phases of

a project which may include the formation of a specific Environmental Justice Task Force to provide input on the development of transportation plans;

- ✓ Utilize the “Interested and Affected Parties Contact List” to identify all interest groups with the intent to foster relationships with relevant agencies and to establish direct contact for feedback on federally funded transportation projects/programs from these agencies;
- ✓ Identify concentrations of protected classes of people by mapping demographic data;
- ✓ Utilize geographical information systems (GIS) to map transportation investments in relation to low income and minority areas with an intent to identify, highlight and analyze projects within these areas; respective to the Metropolitan Transportation Plan (MTP or Transportation Improvement Program (TIP);
- ✓ Investigate the impacts of transportation projects on these populations and work with interest groups and/or neighborhood organizations to explore alternatives;
- ✓ Incorporate environmental justice considerations into MTP and TIP criteria to ensure these issues are addressed in the early phases of the planning process.

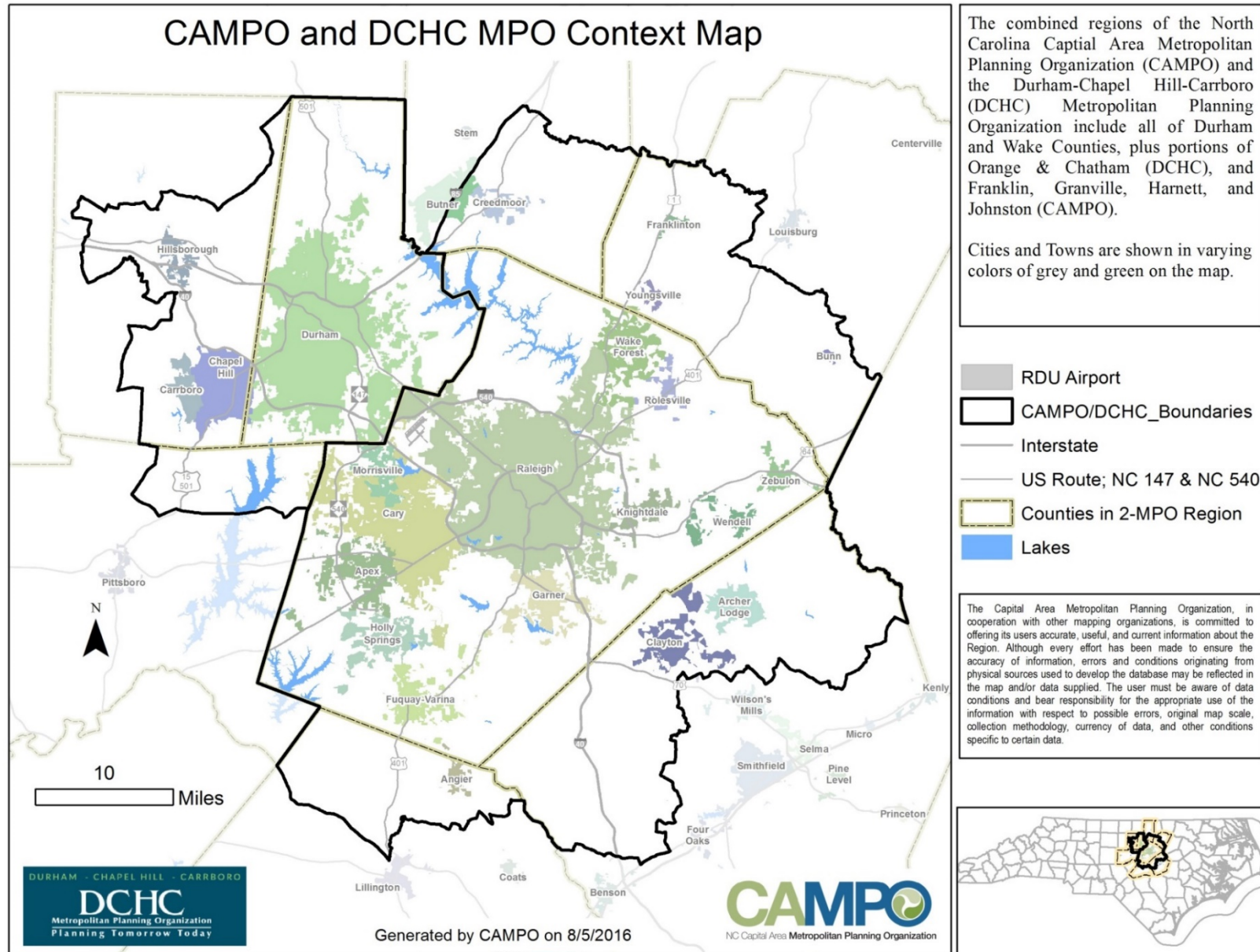


The Capital Area MPO uses Block Group-level data from the US Census American Community Survey to look for concentrations of protected classes. These “communities of concern” (CofC’s) represent where the greatest likelihood of encountering these populations exists geographically. This is not the only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

STANDARD USDOT TITLE VI ASSURANCES

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

CAMPO AND DCHC SERVICE AREA



ORGANIZATION & STAFFING

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

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

The Capital Area Metropolitan Planning Organization (MPO) grew from a collaborative effort between Cary, Raleigh, Garner, and Wake County known as the Greater Raleigh Urban Area Thoroughfare Plan of 1964. During the 1980s and 1990s Apex, Fuquay-Varina, Holly Springs, Knightdale, Morrisville, Rolesville, Wake Forest, Wendell, Zebulon, and Wake County joined the MPO. In early 2005, the MPO invited a number of governments in the surrounding counties to become members.

Many accepted, and as of October 1, 2005, the Capital Area MPO expanded its planning boundary to include parts of Franklin, Granville, Harnett, and Johnston counties including the municipal governments of Angier, Clayton, Creedmoor, Franklinton, and Youngsville.

Most recently, after the 2010 Census, the Town of Archer Lodge was incorporated within the MPO's boundary and became a member of the MPO. These counties and towns which border the expanding Raleigh Urban Area were invited to join MPO to comply with federal regulations that require the MPO to coordinate transportation planning in all the areas that will be part of the "Raleigh urbanized area" within the next twenty-five years. The Capital Area MPO serves as the coordinating agency between local governments, NCDOT, and FHWA. 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](#).

The Capital Area Metropolitan Planning Organization is comprised of three parts: the [Executive Board](#) (formerly the Transportation Advisory Committee (TAC)), a [Technical Coordinating Committee \(TCC\)](#), and a [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 seven-year project programming schedule) and the [Metropolitan Transportation Plan](#) (a minimum twenty-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](#). Our, thirty-five member Technical Coordinating Committee (TCC) is comprised of staff from member and stakeholder agencies. Our, 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 internal staff and officials are familiar and complying with their Title VI obligations.
- Disseminating Title VI information internally and to the public, including in languages other than English.
- Presenting Title VI-related information to decision-making bodies for input and approval.
- Ensuring Title VI-related posters are prominently and publicly displayed.
- Developing a process to collect data related to race, national origin, sex, age, and disability to ensure minority, low-income, and other underserved groups are included and not discriminated against.
- Ensuring that non-elected boards and committees reflect the service area and minorities are represented.
- Promptly processing (receiving, logging, investigating and/or forwarding) discrimination complaints.
- Providing information to NCDOT, 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 new Executive Director.

Staffing

We currently employ a staff of 14, which consists of the following job categories:

- Executive Director
- Deputy Directors (2)
- LAPP Program Manager
- Wake Transit Program Manager
- Finance Officer
- Public Engagement Planner/Title VI Coordinator
- Office Manager/Administrator
- Senior Transportation Planner
- Transportation Planners (1 of 2)
- Transportation Modelling Engineers (1 of 2)
- GIS Programmer/Analyst
- TPAC Administrator
- Engineer Technician

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

DATA COLLECTION/ANALYSIS/REPORTING – REGIONAL DEMOGRAPHIC PROFILES

Data collection, analysis and reporting are key elements of a successful Title VI enforcement strategy. To ensure that Title VI reporting requirements are met, the Capital Area Metropolitan Planning Organization (CAMPO) 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.

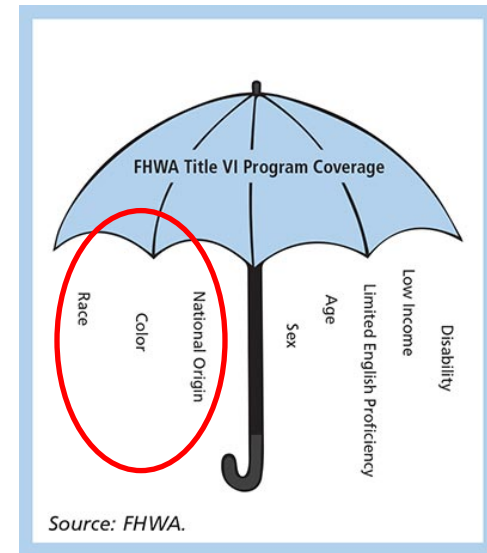
Population Locations

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

REGIONAL DEMOGRAPHIC PROFILES



DEMOGRAPHIC PROFILES: RACE, COLOR, & ORIGIN

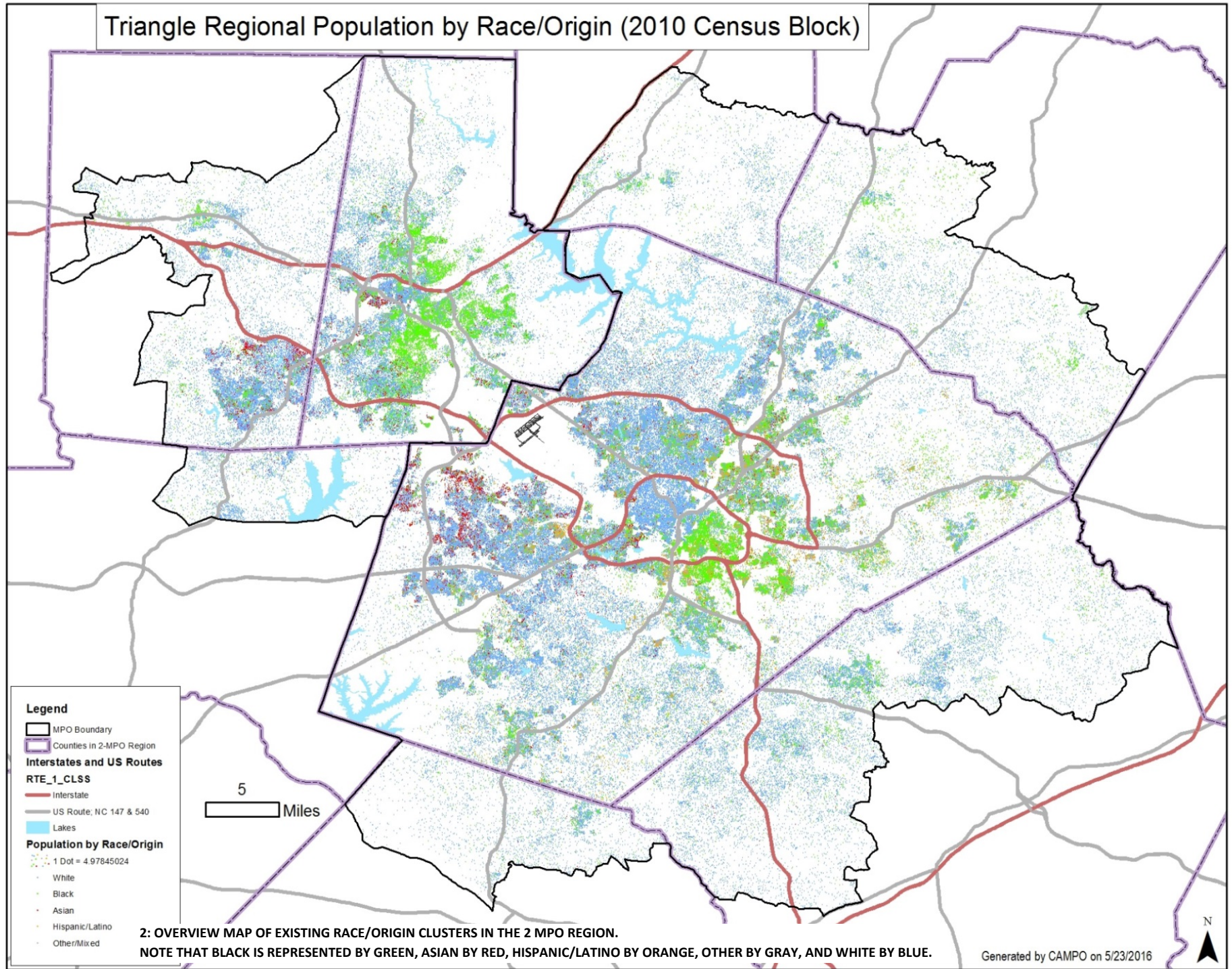


Under the Title VI Program Coverage umbrella, CAMPO first looked at Race, Color, and National Origin. Initially we looked at rolling all the components of these classes into a single measure. The nature of our region made it more effective to measure the most prevalent groups separately. Since the Census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

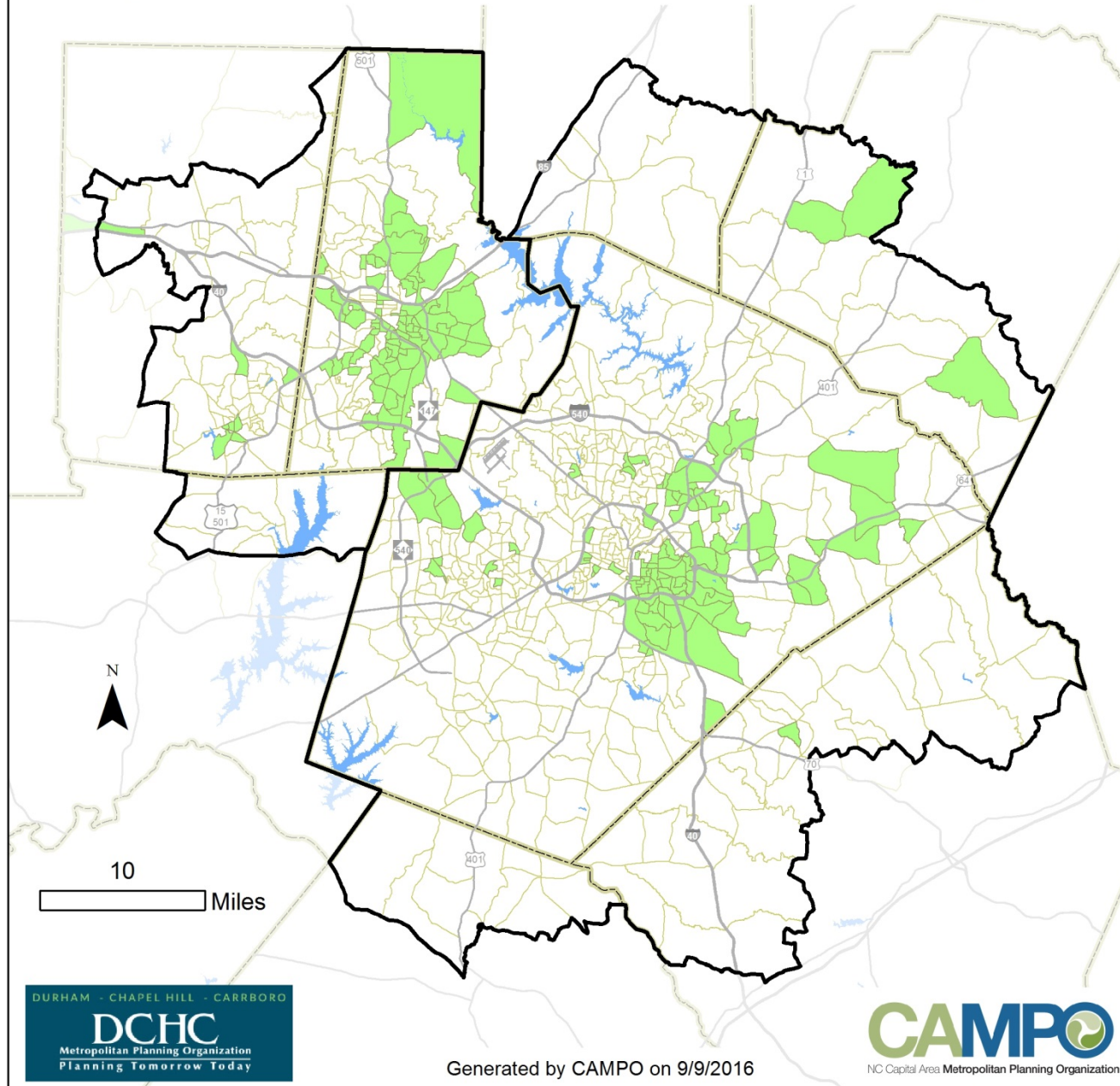
CAMPO used the following measures for Race and Origin:

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 $\geq 45.40\%$ of the people in a block group identifying as non-white.
2. Hispanic/Latino Origin: if a block group is 12.86% Hispanic/Latino or above, it is included as a 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.

Triangle Regional Population by Race/Origin (2010 Census Block)



Top 25% of Non-White Race Census Block Groups



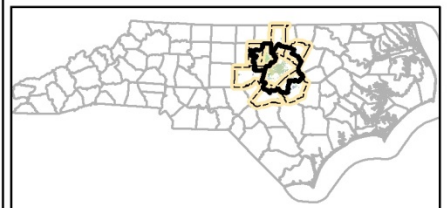
This map shows where concentrations of populations of non-white race exist in the region at or above the 45.40% threshold. The threshold represents block groups where 45.40% of the people living there identify as a non-white race for the Census.

45.40% is the cutoff to be in the highest ranking 188 block groups in the region--the top 25% out of 577 total block groups. Any block groups with zero populations are then removed (usually just the Airport).

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

- RDU Airport
- CAMPO/DCHC_Boundaries
- Interstate
- US Route; NC 147 & NC 540
- Counties in 2-MPO Region
- Lakes
- MinorityNonWhite 45.40%
- 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.



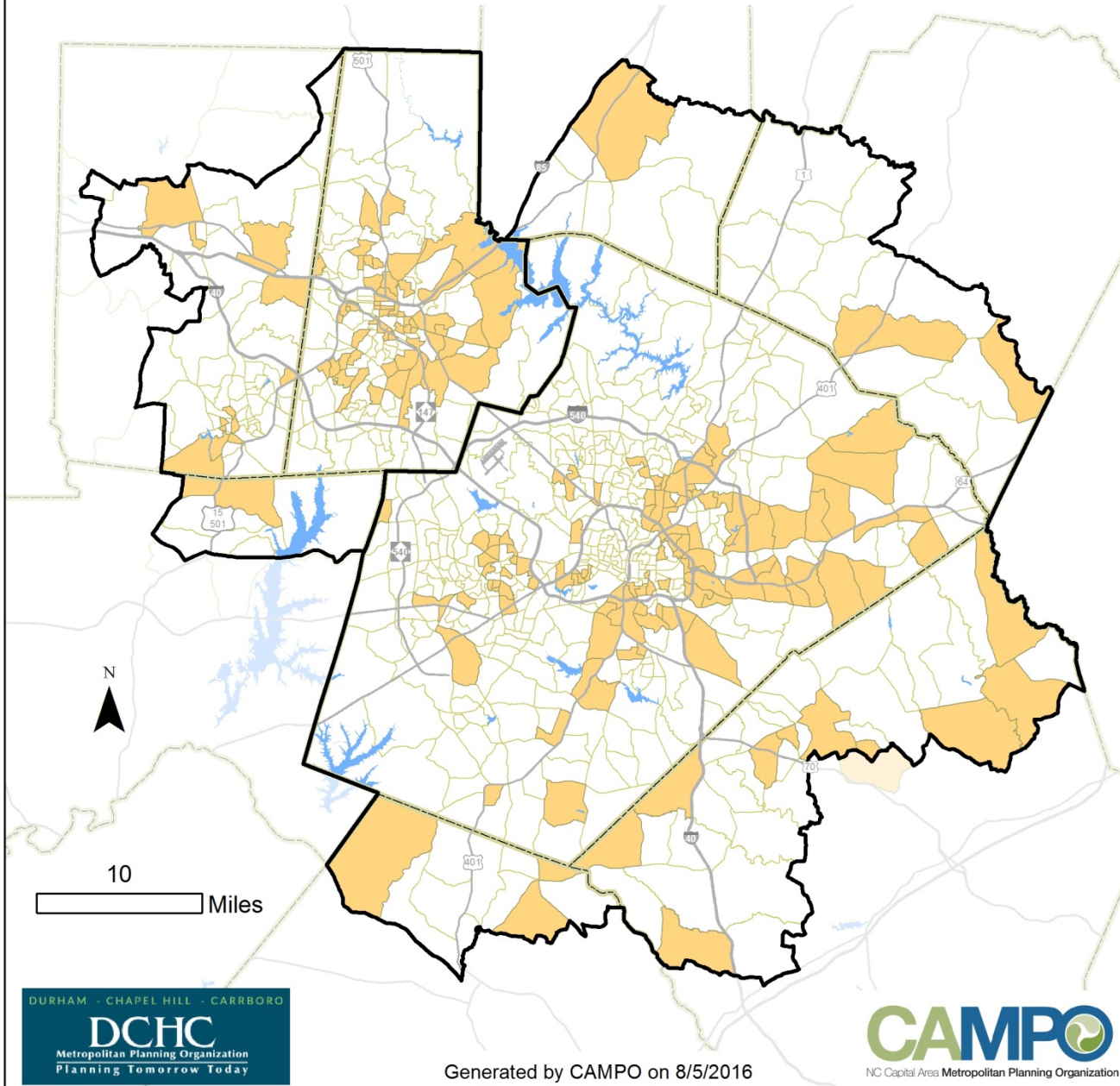
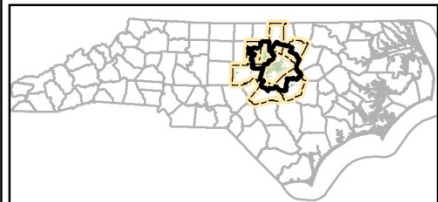
Top 25% of Hispanic/Latino Origin Census Block Groups

This map shows where concentrations of populations of Hispanic/Latino origin exist in the region at or above the 12.86% threshold. The threshold represents block groups where 12.86% of the people living there identify as a non-white race for the Census.

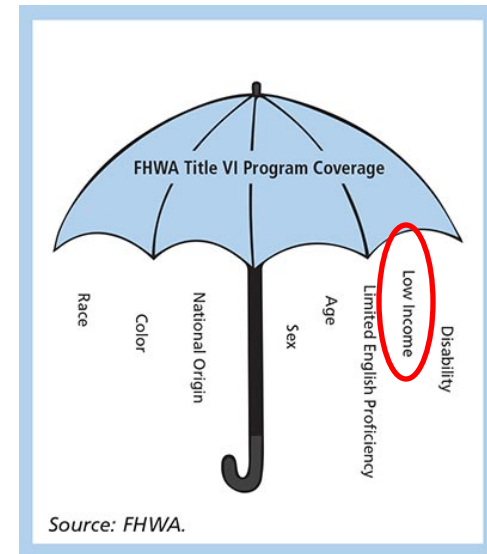
12.86% is the cutoff to be in the highest ranking 188 block groups in the region--the top 25% out of 577 total block groups. Any block groups with zero populations are then removed (usually just the Airport).

-  RDU Airport
-  CAMPO/DCHC_Boundaries
-  Interstate
-  US Route; NC 147 & NC 540
-  Counties in 2-MPO Region
-  Lakes
-  Hispanic/Latino 12.86%
-  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.



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 Highway Administration (FHWA) 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 people in a block group could be compared equally.

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. If 34.07% 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.

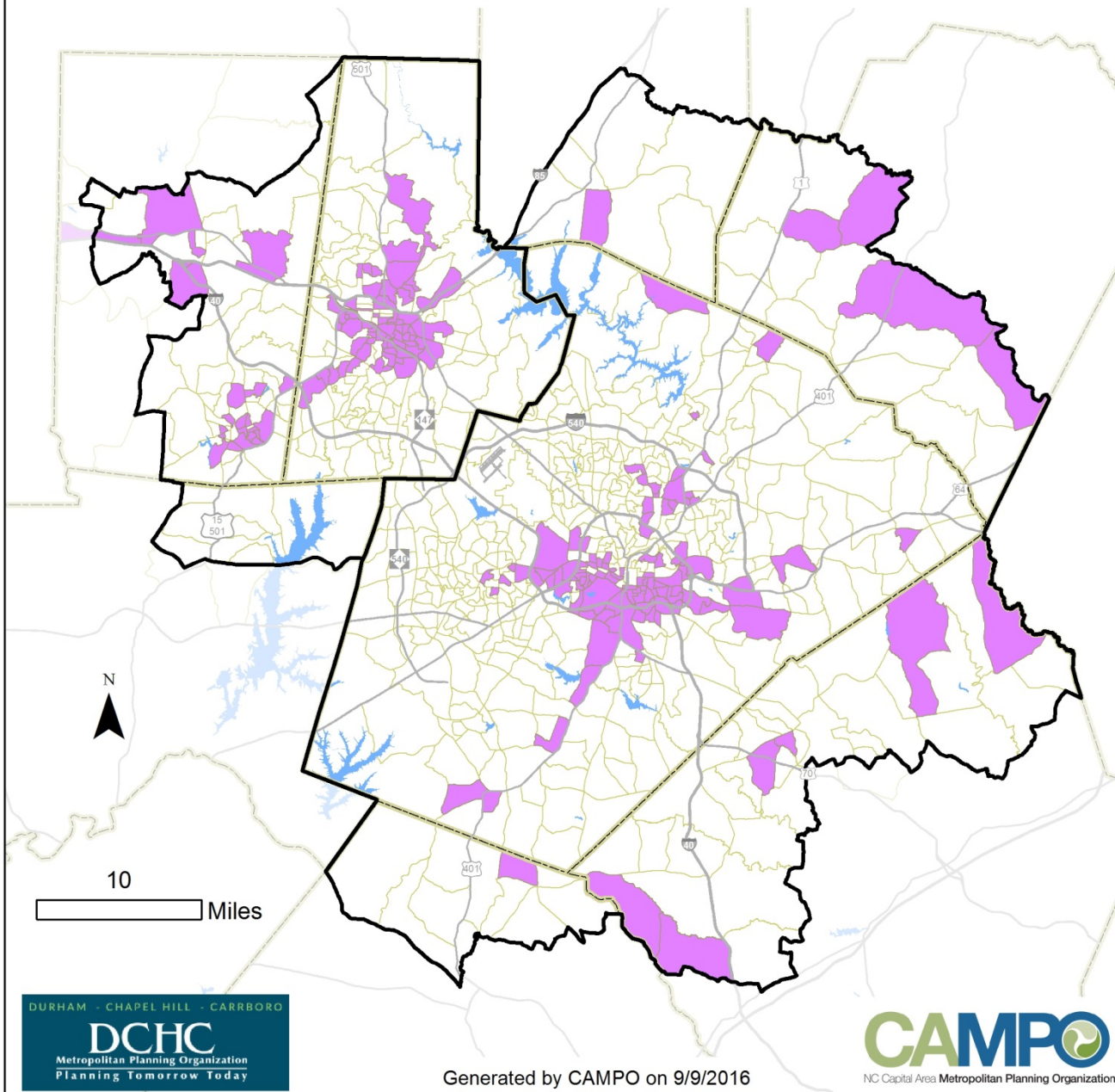
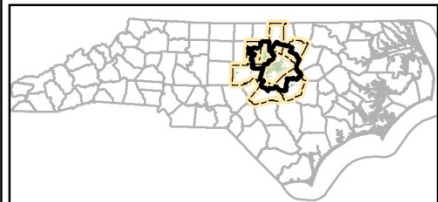
Top 25% of Low Income Census Block Groups

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 low income individuals exist in the region at or above the 34.07% threshold. The threshold represents block groups where 34.07% of the people living there meet the low income criteria.

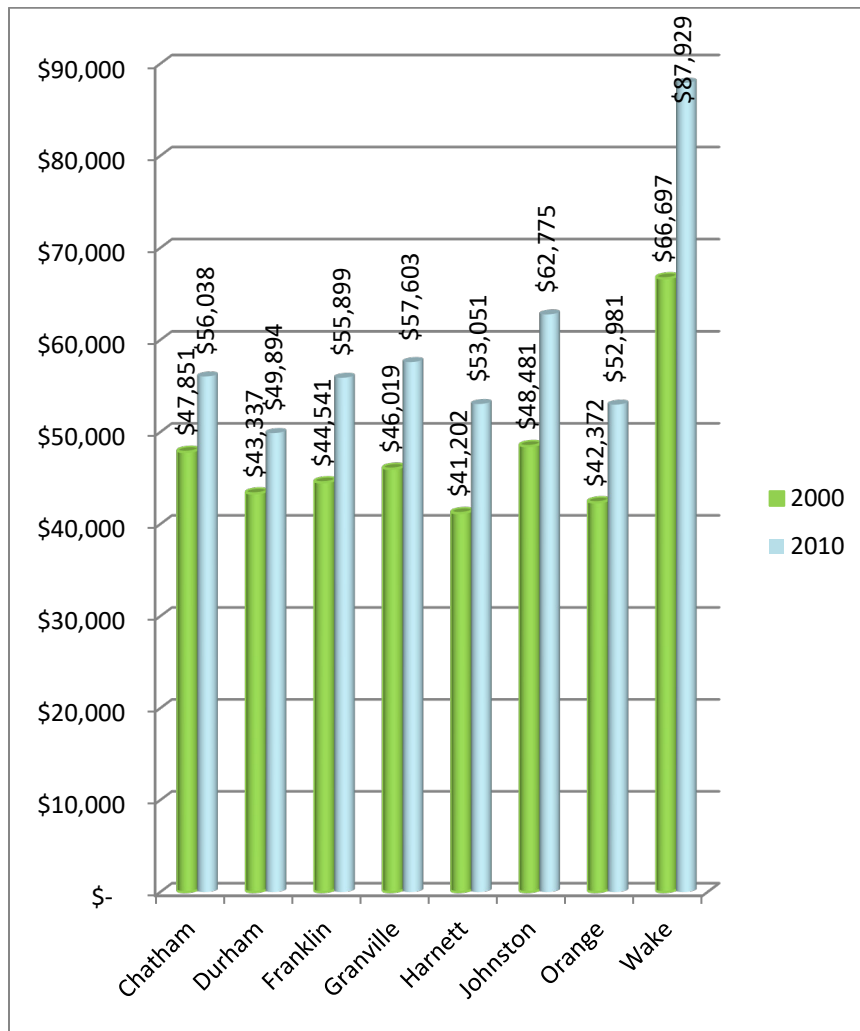
-  RDU Airport
-  CAMPO/DCHC_Boundaries
-  Interstate
-  US Route; NC 147 & NC 540
-  Counties in 2-MPO Region
-  Lakes
-  Below 150% of Poverty 75th
-  Other Block Groups

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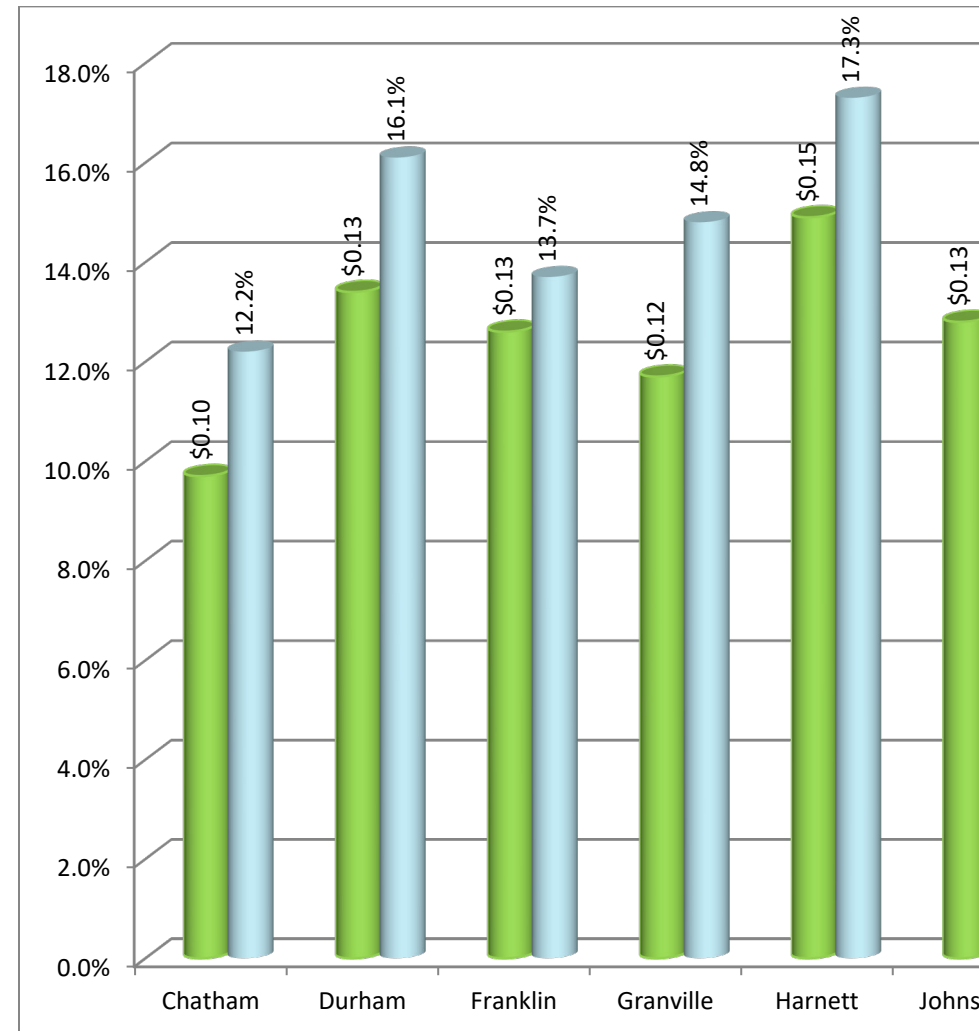
As general background, the US **median household income** for 2000 was \$50,046 and in 2010 it decreased to \$49,455. By comparison, the median household income for the two MPO region's counties those two years increased as shown below:

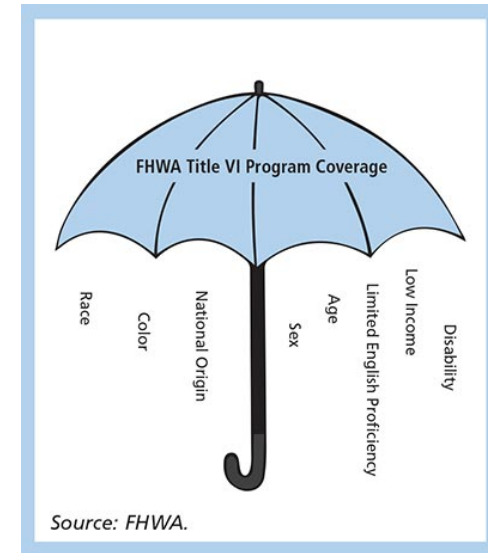
MEDIAN HOUSEHOLD INCOME FOR TRIANGLE COUNTIES



The official poverty threshold depends on family size. For a family of four, the national 2009 poverty line was an income of \$22,350 per year. Using that figure, within the MPO area, the following percentages of persons fell below the poverty level:

% POPULATION LIVING BELOW POVERTY LEVEL





Demographic Profiles: Zero Car Households

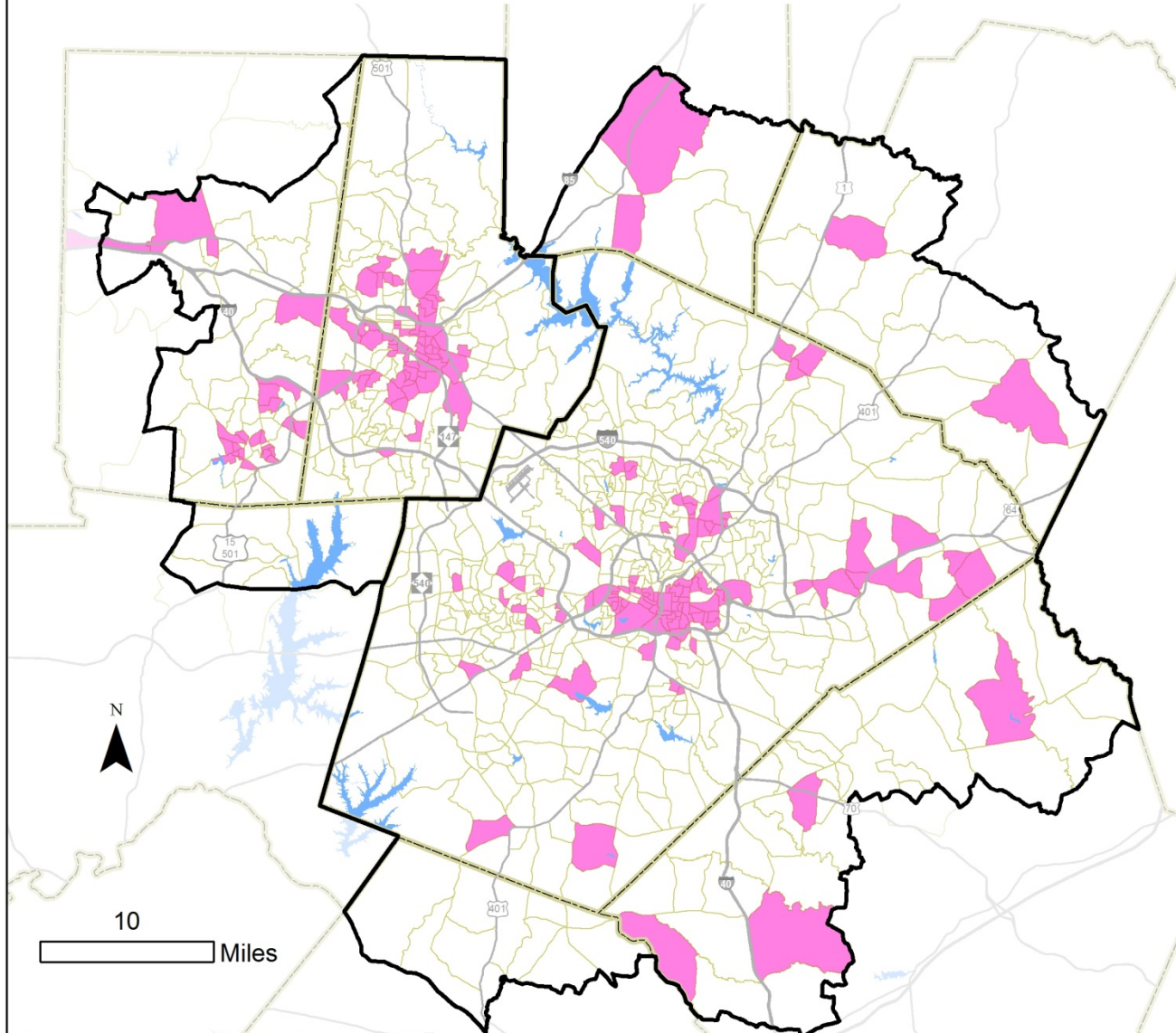


Under the Title VI Program Coverage umbrella, CAMPO considers Zero-car Households as a surrogate for the transportation needs of disabled persons. A review of disabled status persons shows that with a few exceptions in the most rural block groups, there is an even distribution across the region for this measure. This meant that as a standalone measure, Disability did not meet principle 3¹: yields a pattern that allows for targeted outreach and a meaningful analysis.

After meeting with the regional partners, it was determined that where transportation is concerned, zero-car households was an available measure that might work.

¹ see the “Technical Notes” section immediately following the demographic profiles to see all 3 principles

Top 25% of Zero-Car Household Census Block Groups

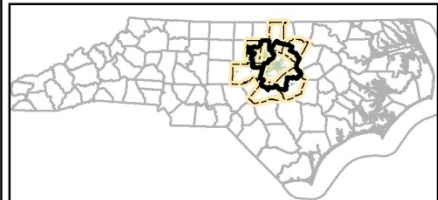


This map shows where concentrations of populations of households with no automobile transportation exist in the region at or above the 7.98% threshold. The threshold represents block groups where 7.98% of the people living there identify as a non-white race for the Census.

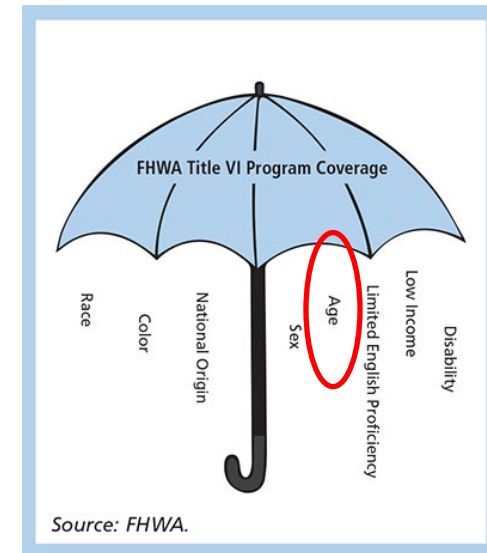
7.98% is the cutoff to be in the highest ranking 188 block groups in the region--the top 25% out of 577 total block groups. Any block groups with zero populations are then removed

- RDU Airport
- CAMPO/DCHC_Boundaries
- Interstate
- US Route; NC 147 & NC 540
- Counties in 2-MPO Region
- Lakes
- Zero Car HHs 7.98%
- Other Block Groups

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DEMOGRAPHIC PROFILES: AGE



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 year 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.

Vision: Conditions such as cataracts, macular degeneration, glaucoma and diabetic retinopathy can hamper driving ability. Your parent's optometrist or ophthalmologist can identify vision problems, limitations, concerns and cautions. It is possible that some limitation in vision can be accommodated by not driving at dusk or night. Some conditions, such as cataracts and glaucoma, can be corrected surgically. If your mom or dad wears glasses, schedule an annual eye and vision examination.

Physical ability: Driving takes dexterity, ability and strength in both arms and legs/feet to control the vehicle at all times. Consider any physical

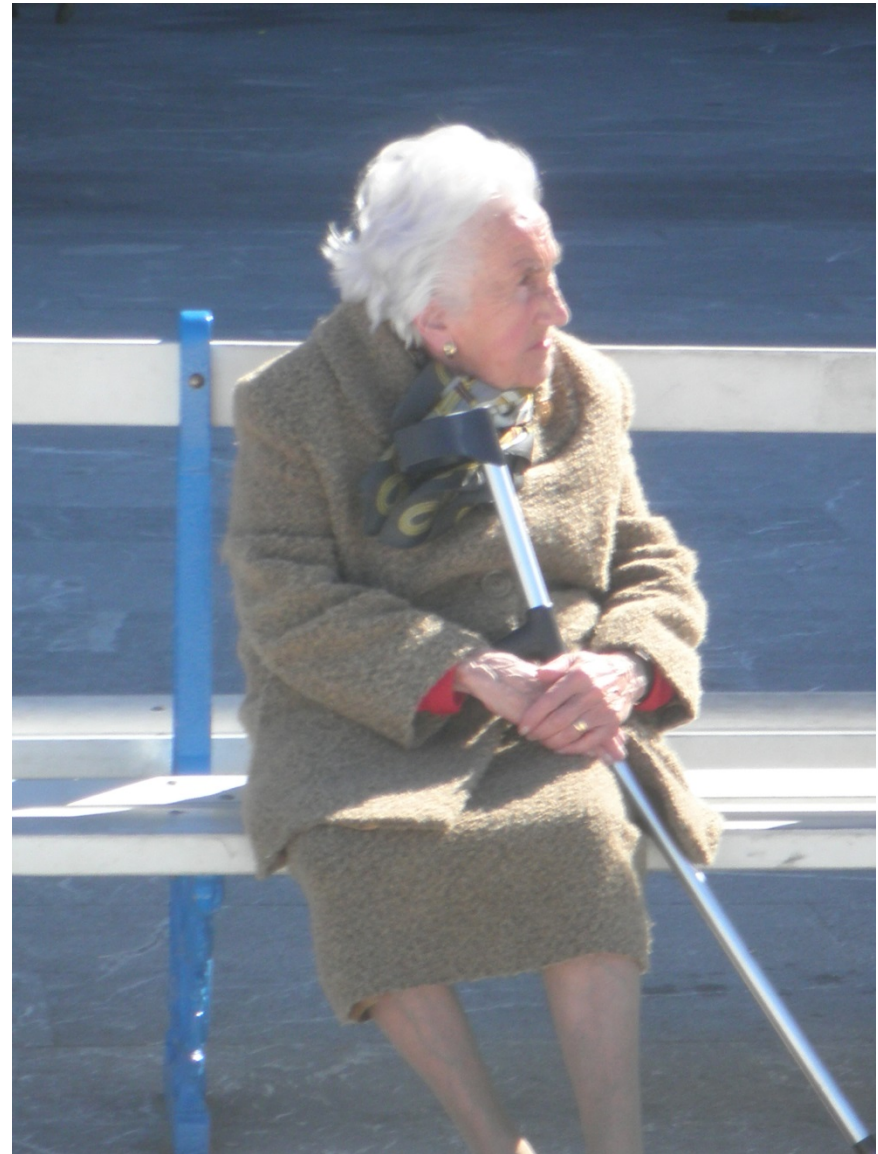
limitations. Consider, too, if he or she has shrunk a bit in physical size, where the solution may be to move the driver's seat forward and upward for both better control and vision over the hood of the car, and/or adding a pillow.

Physical activity: Mature adult drivers die in auto accidents at a rate higher than other age bracket because, at home, many do little or no exercise, not even a daily walk outside. Therefore, if your parent currently does no physical activity to maintain or build strength, agility and aerobic ability, this should be a concern. Importantly, it is probably correctable by introducing him or her to less television time and more physical activity.

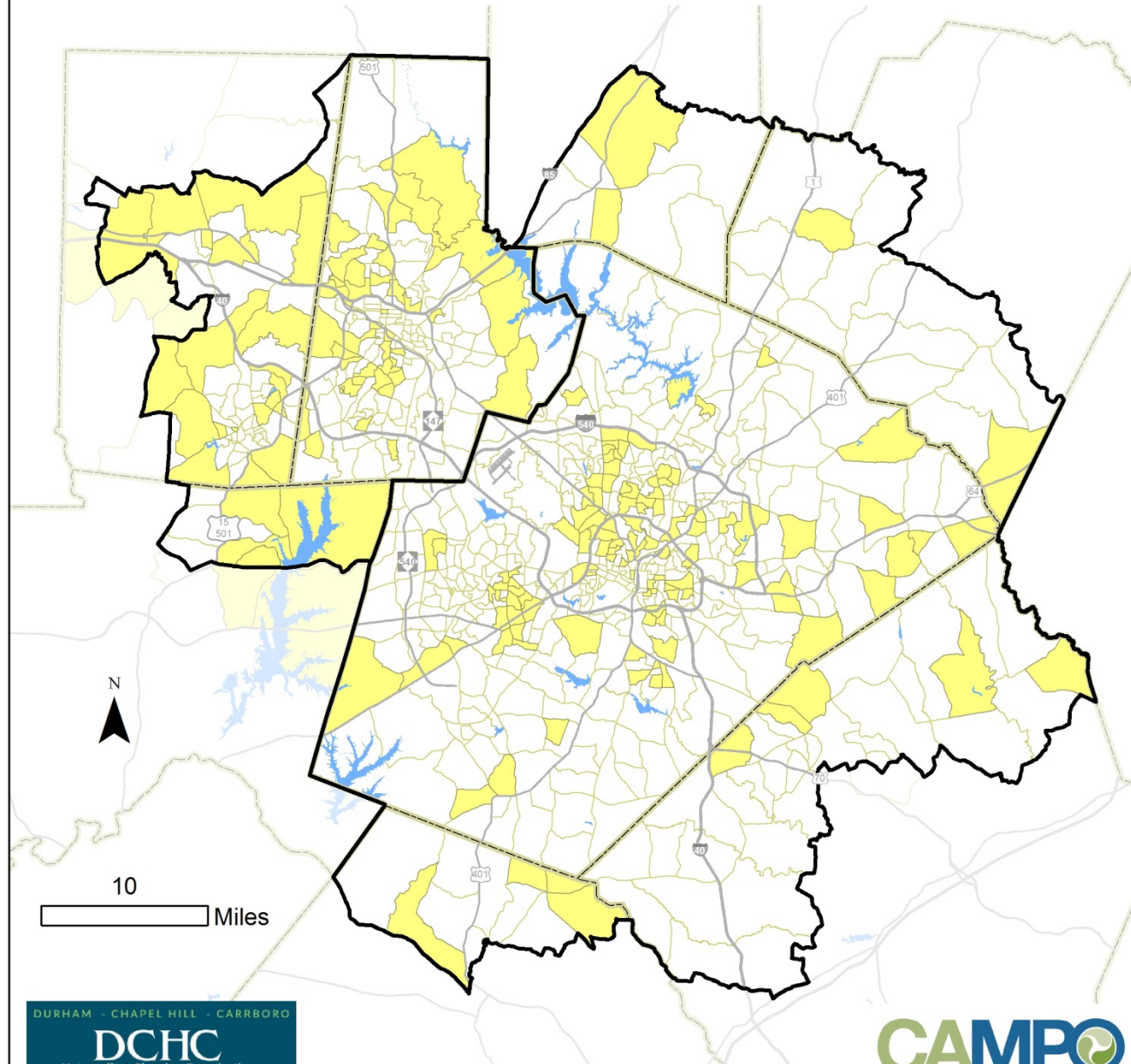
Diseases: Patients with Alzheimer's disease can become disoriented almost anywhere, and a severe diabetic may fall into a coma. The parent's physician can advise of such possible problems and risks. But, don't assume that your parent has Alzheimer's if he or she forgets momentarily the location of a wallet, purse or newspaper.

Medications: Prescription drugs are chemicals designed to produce specific and desired changes or functions within the body. But, as in the law of physics, for every action there is a reaction. That reaction may be drowsiness and/or a slowing of the person's reaction time. In the field of medicine these are identified as side effects and may affect, even seriously, a person's ability to drive.

Because of the potential loss of their ability to drive, people over 70 were included as in indicator for special consideration for transportation planning.



Top 25% of Age 70 and Over Census Block Groups

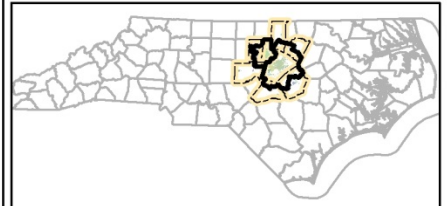


This map shows where concentrations of populations of persons 70 years old and older exist in the region at or above the 9.23% threshold. The threshold represents block groups where 9.23% of the people living there identify as a non-white race for the Census.

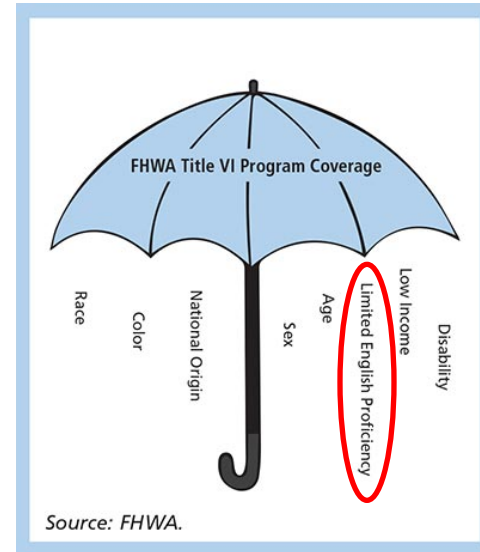
9.23% is the cutoff to be in the highest ranking 188 block groups in the region--the top 25% out of 577 total block groups. Any block groups with zero populations are then removed

- RDU Airport
- CAMPO/DCHC_Boundaries
- Interstate
- US Route; NC 147 & NC 540
- Counties in 2-MPO Region
- Lakes
- Age70Plus
- Other Block Groups

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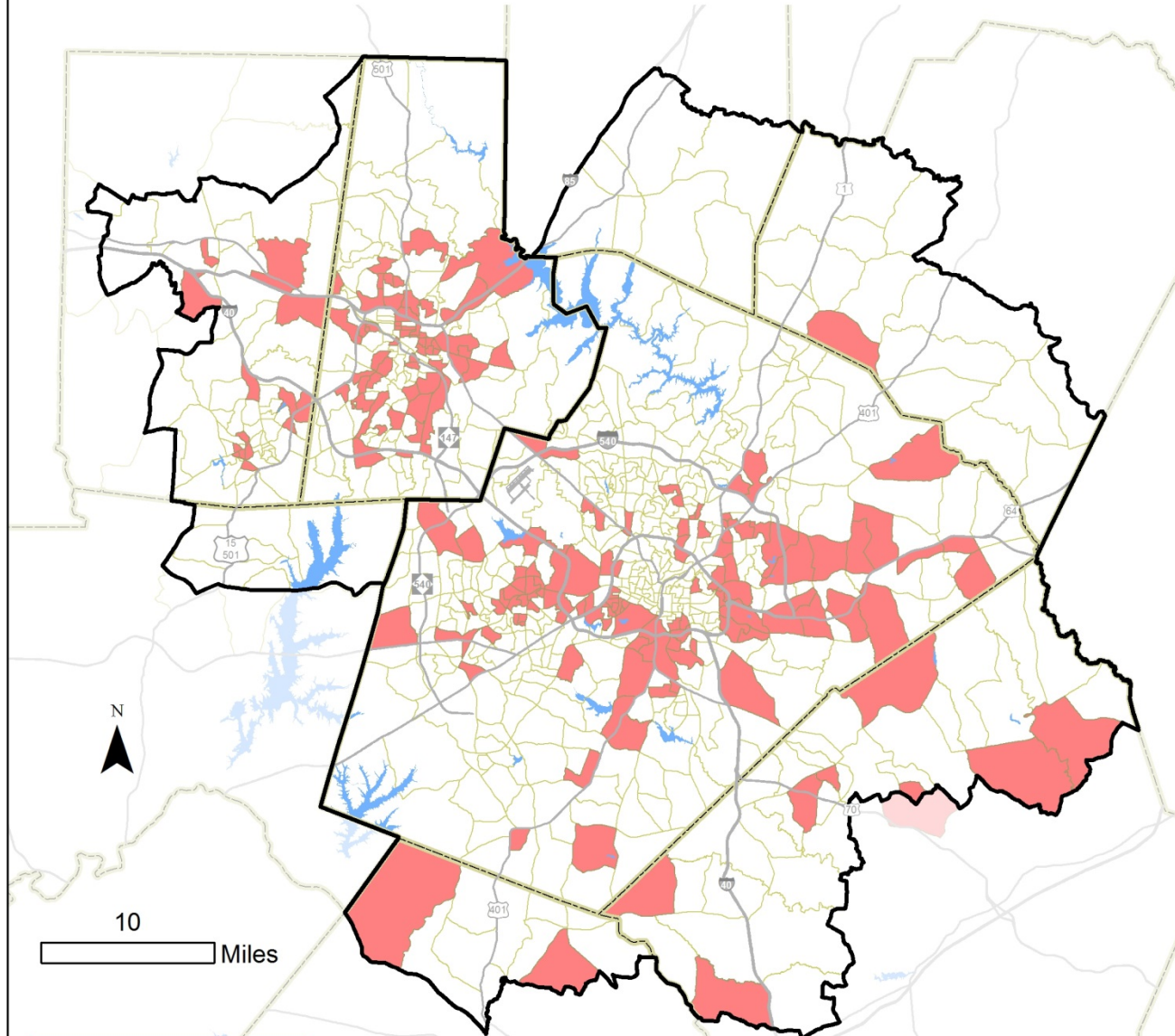
DEMOGRAPHIC PROFILES: LIMITED ENGLISH PROFICIENCY



While limited English proficiency (LEP) is an inclusive 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.



Top 25% of Linguistically Isolated Census Block Groups



DURHAM - CHAPEL HILL - CARRBORO
DCHC
 Metropolitan Planning Organization
 Planning Tomorrow Today

Generated by CAMPO on 8/17/2016

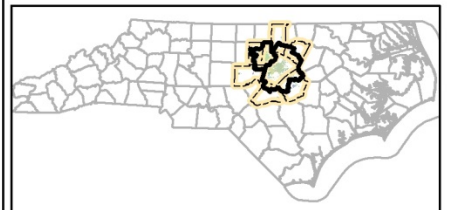
CAMPO
 NC Capital Area Metropolitan Planning Organization

This map shows where concentrations of populations of persons who do not speak English or speak English "less than very well" exist in the region at or above the 6.42% threshold. The threshold represents block groups where 6.42% of the people living there identify as a non-white race for the Census.

6.42% is the cutoff to be in the highest ranking 188 block groups in the region--the top 25% out of 577 total block groups. Any block groups with zero populations are then removed (usually just the Airport).

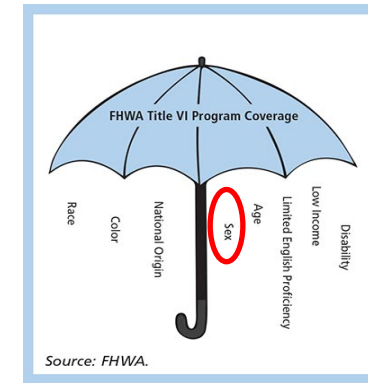
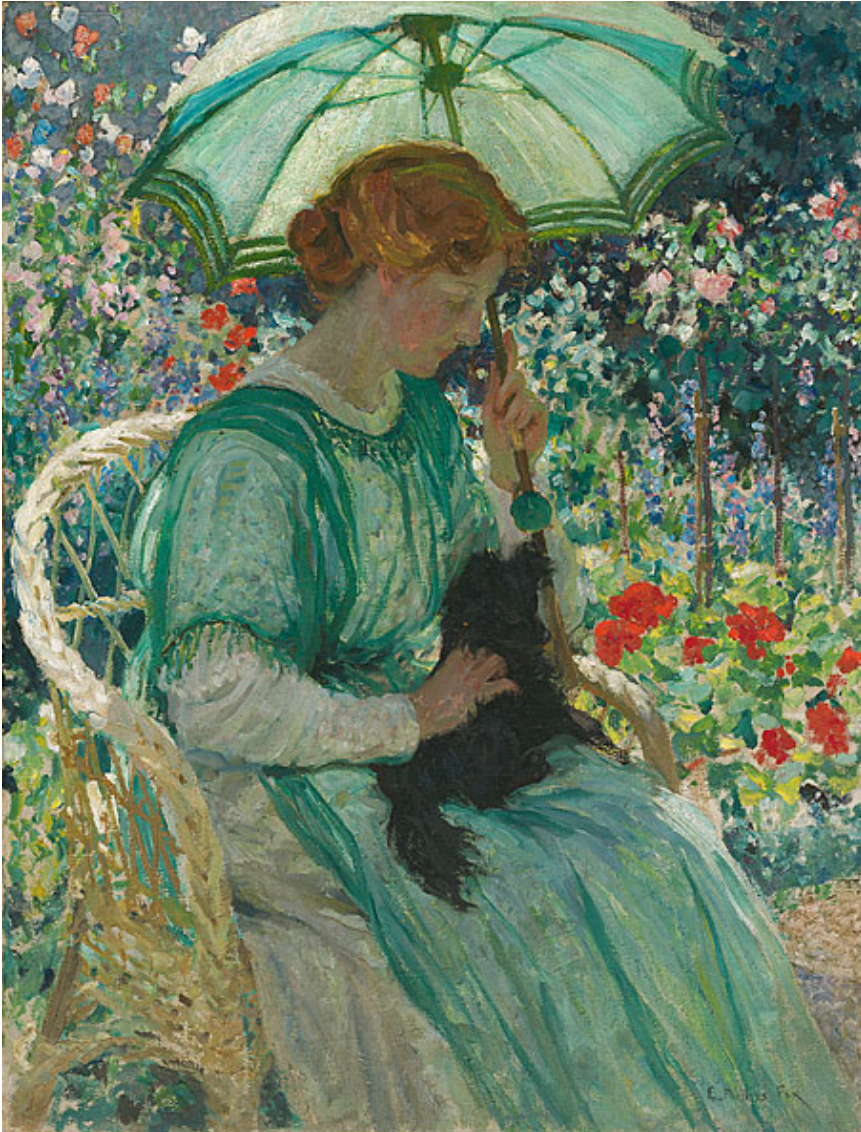
- RDU Airport
- CAMPO/DCHC_Boundaries
- Interstate
- US Route; NC 147 & NC 540
- Counties in 2-MPO Region
- Lakes
- Linguistically Isolated
- Other Block Groups

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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.

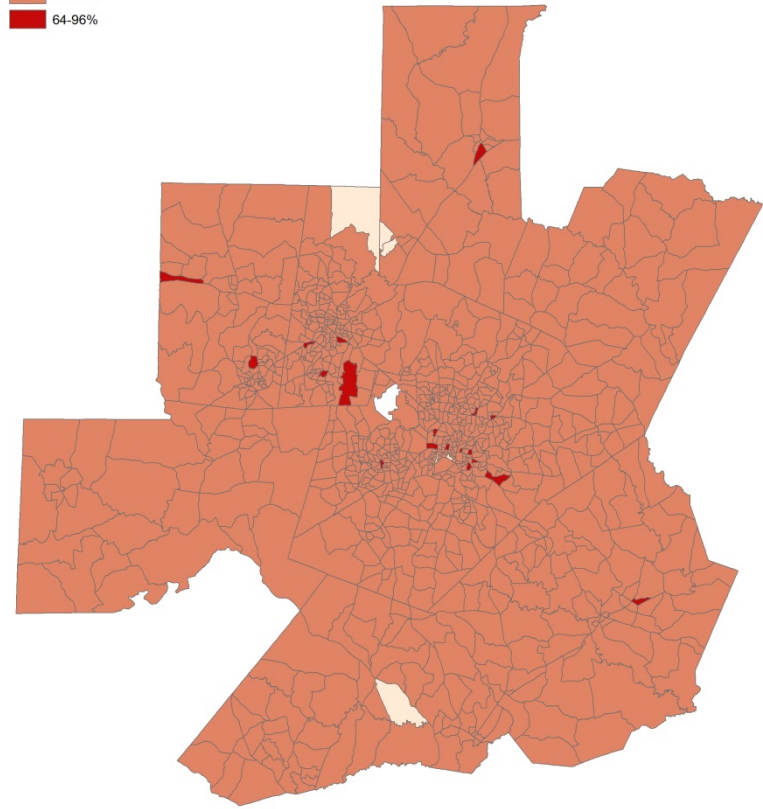


DISTRIBUTION OF FEMALE POPULATION CAMPO & DCHC COUNTIES

ACS_2014_5YR_BG_37_NORTH_CAROLINA

SEX BY AGE: Female: Total population -- (Estimate) / SEX BY AGE: Total: Total population -- (Estimate)

- 0-32%
- 32-64%
- 64-96%



Generated by CAMPO on: 6/30/2016

25

Miles

DEMOGRAPHIC PROFILES: FINAL COMMUNITY OF CONCERN MAP



Once all the places with concentrations of likely Title VI populations are mapped, we put them all together to create a map 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

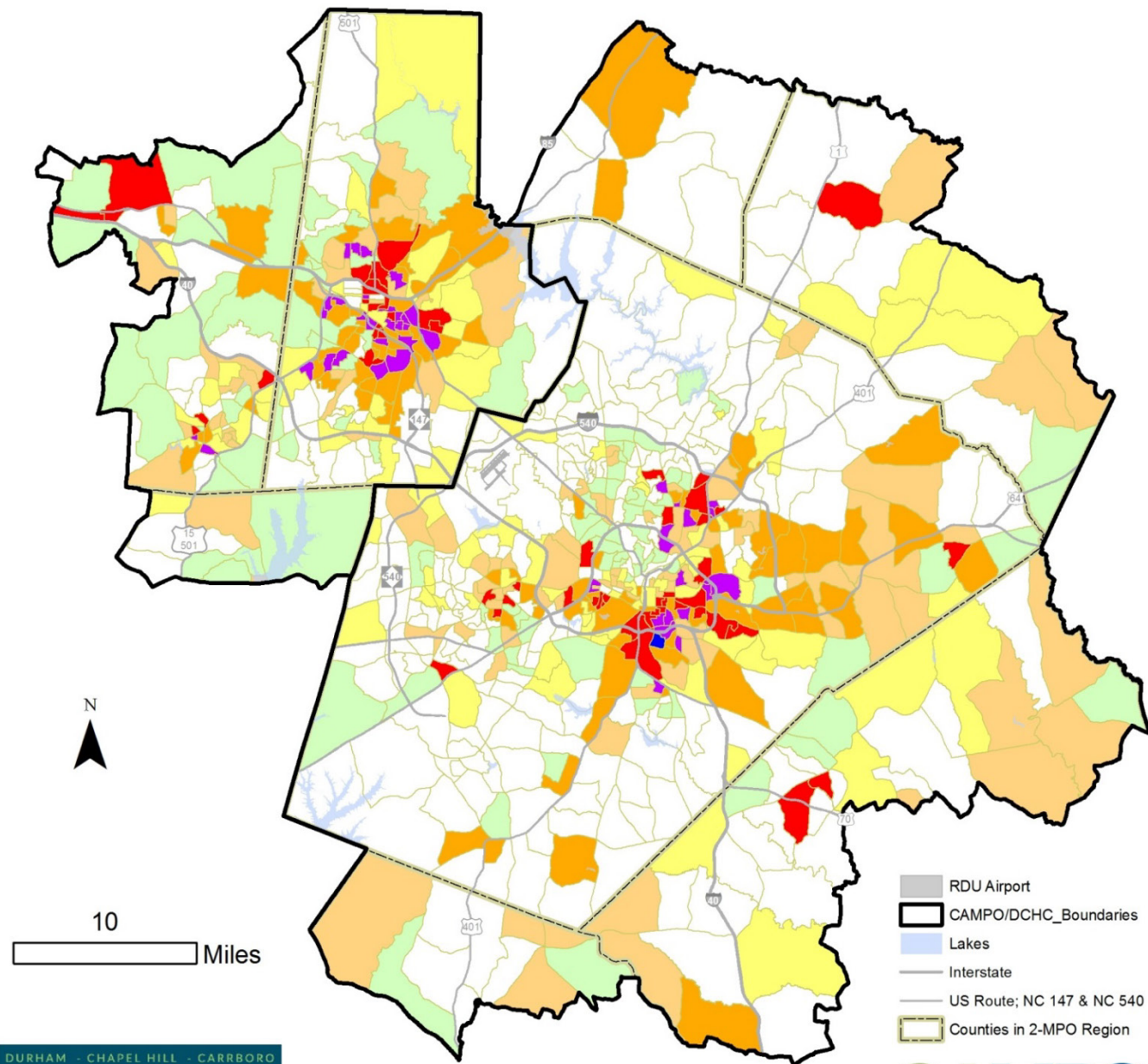
Where age is the only trigger, those areas are shown differently because age does not cluster spatially like many of the other indicators.

Regional 75th Percentile Number of Indicators Overlap

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, Linguistic Isolation, 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



ENVIRONMENTAL JUSTICE (EJ)/COMMUNITIES OF CONCERN

In 1994, President William Jefferson Clinton issued Executive Order (EO) 12898, Federal Actions to Address Environmental Justice (EJ) in Minority Populations and Low-Income Populations. To comply with the EO, federal agencies developed EJ guidelines for their funding recipients, including Federal Highway Administration (FHWA) Order 6640.23A. Accordingly, the 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.

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

- (1) Identifying and evaluating environmental, public health, and interrelated social and economic effects of our programs, policies and activities;
- (2) Proposing measures to avoid, minimize and/or mitigate disproportionately high and adverse environmental and public health effects, and interrelated social and economic effects, and providing offsetting benefits and opportunities to enhance communities, neighborhoods, and individuals affected by our programs, policies and activities, where permitted by law;

- where such alternatives would result in avoiding and/or minimizing,
- (4) disproportionately high and adverse human health or environmental impacts to minority and/or low-income populations; and
 - (5) Eliciting public involvement opportunities and considering the results thereof, including soliciting input from affected minority and low-income populations in considering alternatives.
 - (6) Adding an EJ section to plans and studies, such as Long Range Plans, Public Participation Plans, and Corridor 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, FHWA or FTA upon request, during compliance reviews or complaint investigations. (See **Regional Demographic profiles – Tables and Maps for Race/Ethnicity and Poverty**)

As part of EJ, consider the following technical notes on the methodology for considering Communities of Concern.

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



CAMPO will look at each protected class and then show how they overlap geographically, identifying 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 special outreach and evaluate the relative benefit/burden of transportation investments in the region in the Metropolitan Transportation Plan (MTP) or Transportation Improvement Program (TIP).

HOW TO DETERMINE A COMMUNITY OF CONCERN

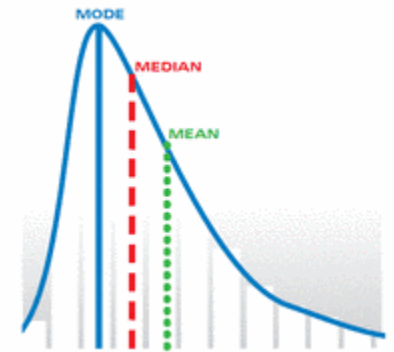
The MPO looked at many different statistical methods to get at the fundamental question, “What is a community of concern?” With the end in mind, there were 3 principles that guided how to define if an area was “in” or “out” statistically:

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 in light of 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 investment

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. Our region has 755 block groups, so each measure will take the highest 188 block groups (top 25%).

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

1. Use of Census Block Groups in the 2-MPO region as the geographic unit. This is because they are updated each year, and some data are only available at this scale. It also helps compare urban, suburban, and rural areas in an “apples to apples” way.²
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. For instance, if a millionaire has a house in a block group where most residents are low-income, the “mean” (what most people think of as the “average”) will be too high due to the millionaire. 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 we evaluate as a percentage. This also helps to create an “apples-to-apples” comparison for urban, suburban, and rural parts of the region.



² The way block groups are drawn, it helps “spatially normalize” the data.

The MPO 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 sat down with other regional stakeholders involved in the statistical definition of what goes into identifying CofCs on February 4, 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”. On August 2nd the group reconvened with FHWA and NCDOT’s Office of Civil Rights included as well.

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 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.

LIMITED ENGLISH PROFICIENCY



LIMITED ENGLISH PROFICIENCY OUTREACH

The LEP policy guidance provided by the US Department of Transportation (see attached pages A-1 and A-2) is to clarify the responsibilities of recipients of federal financial assistance from the US DOT 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 provide 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.



LIMITED ENGLISH PROFICIENCY (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 are consistent with the compliance standards and framework detailed in 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.

The LEP plan is in place to ensure access to the planning process and information published by the MPO for those 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.

LIMITED ENGLISH PROFICIENCY – 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 limited English proficiency? National surveys have determined that about 20 percent of Americans are "low literate;" i.e., they read and comprehend in English below a fifth-grade level. Another 25 percent of Americans have literacy skills below a seventh-grade level. The 2000 Census found that about 18 percent of Americans speak a language other than English at home. Limited-English proficiency 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.

U.S. DOT 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 Department will take "reasonable steps" to remove barriers for LEP individuals.

Once identified, the MPO should make every reasonable effort to ensure the LEP populations have timely and inclusive access to the information and processes.

LIMITED ENGLISH PROFICIENCY: 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 MLI and LEP persons in the eligible service population
2. the frequency with which MLI and LEP persons come in contact with the program or activity
3. the nature and importance of the program, activity or service provided by the program to people's lives
4. the resources available to the recipient and costs



IMAGE COURTESY OF GOTRIANGLE, 2018

LIMITED ENGLISH PROFICIENCY: THE NUMBER AND PROPORTION OF LEP PERSONS IN THE ELIGIBLE SERVICE POPULATION:

The NC Capital Area MPO planning area consists of Wake County and portions of 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 Census data from the 2010-2014 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.

Spanish continues to be the primary language that triggers the need for targeted outreach and proactive translation of materials for both MPOs. The 2010-2014 ACS data estimates almost 79,000 native Spanish speakers who speak English "Less than very well" in the 9-county region. That is 4.25% of the region's population. No other language group comes close, with the next highest being Chinese at 0.36%. Because "Chinese" does not differentiate between major language groups (Mandarin, Cantonese, Wu, Min, Hakka, etc), Korean is the next, true comparison with 3,129 speakers. For written communication, written Chinese does not differ between the main Chinese languages; for on-site interpreting they are different.

Because the two MPOs do not have the same language profiles, for the purposes of the regional plan, a language that is considered "primary consideration" means that it meets thresholds for both MPOs. "Secondary consideration" means that it only triggers in one of the two MPOs. Each MPO is responsible for meeting translation policies and requirements as they apply in their individual MPO.

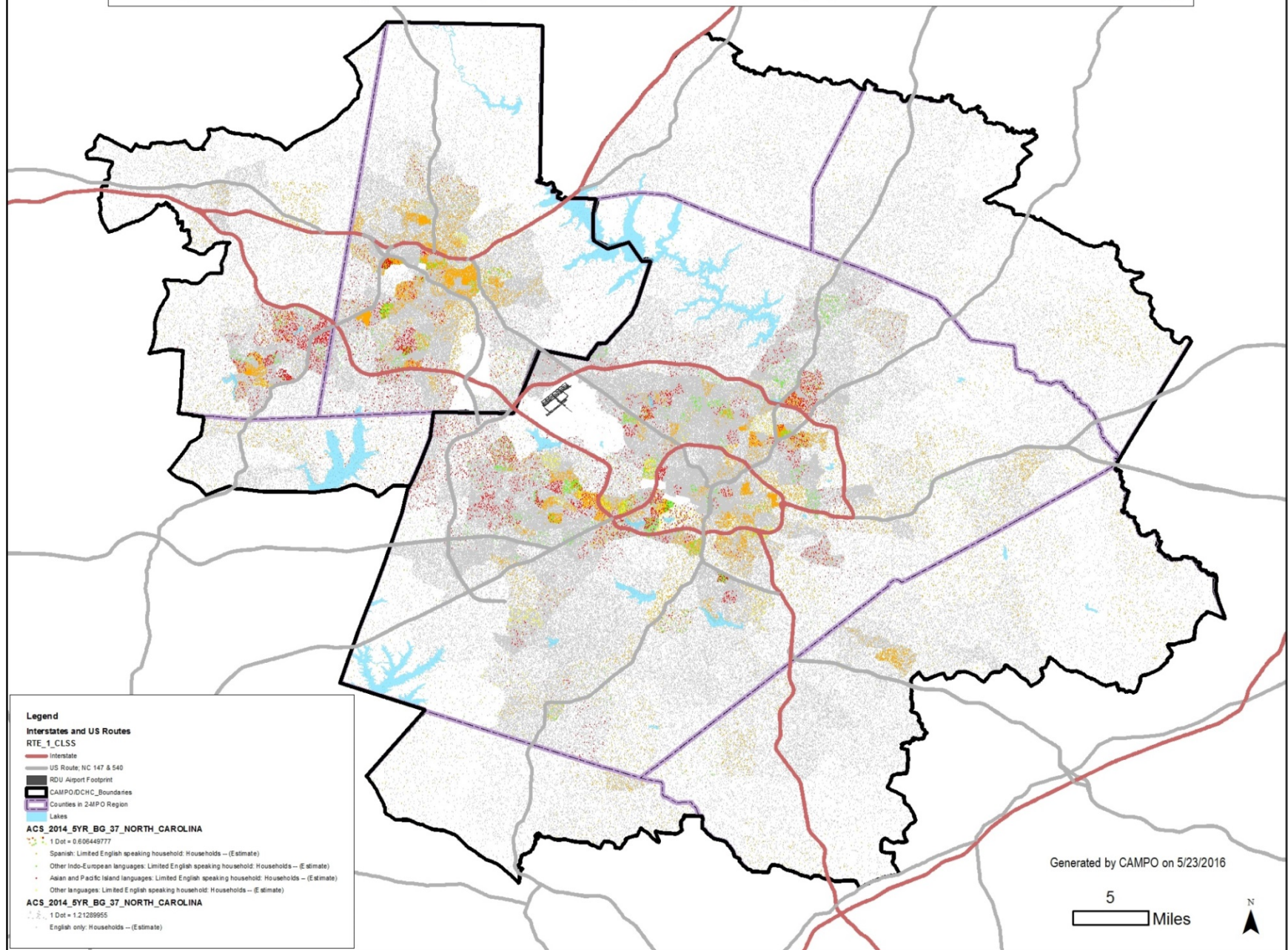


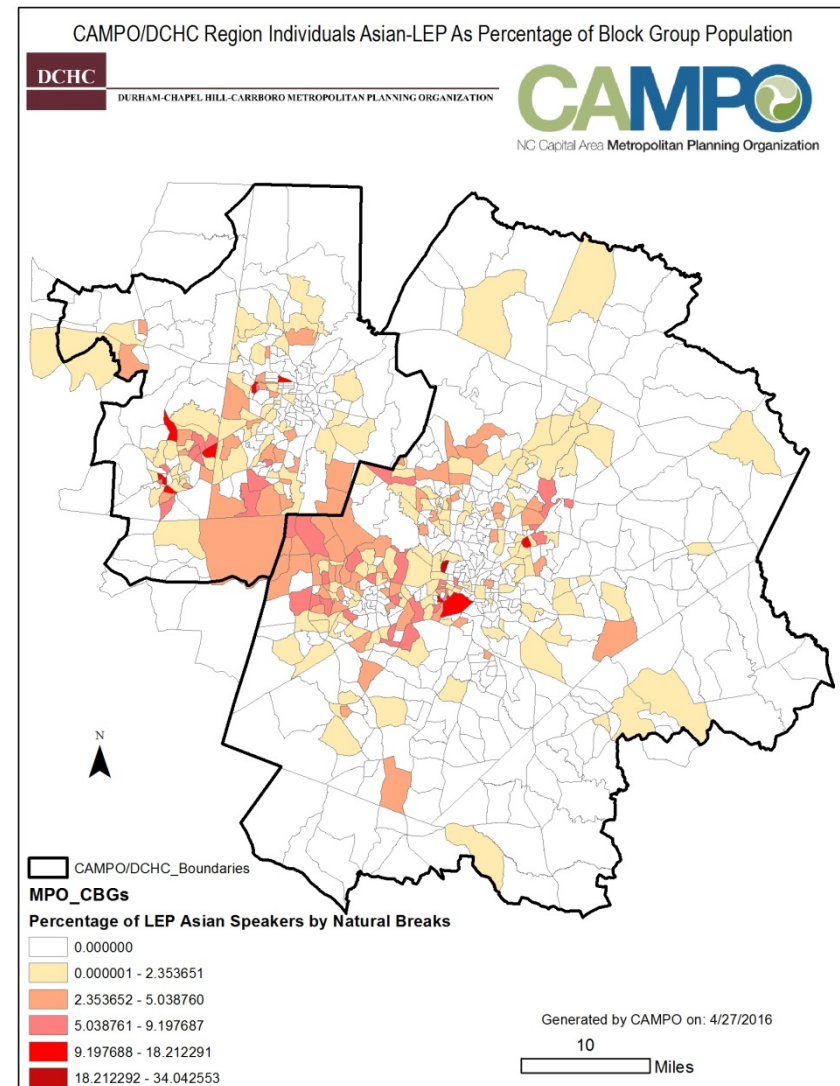
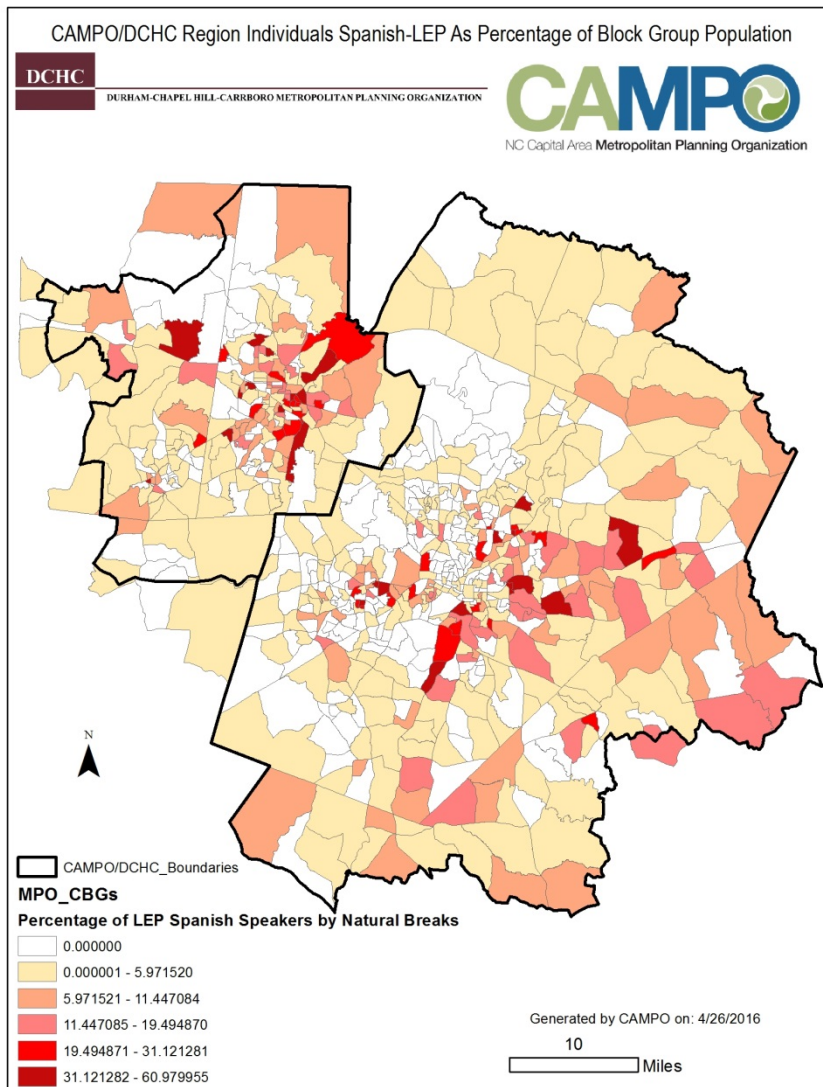
THE FREQUENCY WITH WHICH LEP INDIVIDUALS COME IN CONTACT WITH THE PROGRAMS OR ACTIVITIES.

Although targeted specifically at outreach events current contact with LEP individuals is relatively infrequent but our commitment to serve this group is a priority. 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. To date, no request had been made for either individuals or groups directly to the MPO for Spanish or other language interpreters or publications. Nevertheless, arrangements have been made with the city of Raleigh public affairs department to put together a list of employees who speak languages other than English to be available for translation services if needed. North Carolina State University participates in an English translation program for various languages as well.

Language Information	Number of Persons	% Speak English less than "very well"	Language Information	Number of Persons	% Speak English less than "very well"
8-County Region Total	1730550				
Speak only English	1460699				
Spanish or Spanish Creole:	160267		Other Indic languages:	4697	
Speak English less than "very well"	78781	4.55%	Speak English less than "very well"	1532	0.09%
French (incl. Patois, Cajun):	8042		Other Indo-European languages:	1949	
Speak English less than "very well"	1760	0.10%	Speak English less than "very well"	429	0.02%
French Creole:	615		Chinese:	15427	
Speak English less than "very well"	122	0.01%	Speak English less than "very well"	6387	0.37%
Italian:	2121		Japanese:	1675	
Speak English less than "very well"	281	0.02%	Speak English less than "very well"	624	0.04%
Portuguese or Portuguese Creole:	1584		Korean:	6362	
Speak English less than "very well"	434	0.03%	Speak English less than "very well"	3129	0.18%
German:	4775		Mon-Khmer, Cambodian:	308	
Speak English less than "very well"	415	0.02%	Speak English less than "very well"	206	0.01%
Yiddish:	28		Hmong:	157	
Speak English less than "very well"	6	0.00%	Speak English less than "very well"	32	0.00%
Other West Germanic languages:	1145		Thai:	630	
Speak English less than "very well"	42	0.00%	Speak English less than "very well"	296	0.02%
Scandinavian languages:	709		Laotian:	213	
Speak English less than "very well"	85	0.00%	Speak English less than "very well"	66	0.00%
Greek:	794		Vietnamese:	5510	
Speak English less than "very well"	150	0.01%	Speak English less than "very well"	2919	0.17%
Russian:	2103		Other Asian languages:	10826	
Speak English less than "very well"	453	0.03%	Speak English less than "very well"	2313	0.13%
Polish:	926		Tagalog:	3718	
Speak English less than "very well"	189	0.01%	Speak English less than "very well"	768	0.04%
Serbo-Croatian:	189		Other Pacific Island languages:	1080	
Speak English less than "very well"	35	0.00%	Speak English less than "very well"	443	0.03%
Other Slavic languages:	1253		Navajo:	14	
Speak English less than "very well"	264	0.02%	Speak English less than "very well"	7	0.00%
Armenian:	85		Other Native North American languages:	244	
Speak English less than "very well"	8	0.00%	Speak English less than "very well"	24	0.00%
Persian:	1881		Hungarian:	514	
Speak English less than "very well"	658	0.04%	Speak English less than "very well"	55	0.00%
Gujarati:	3380		Arabic:	8257	
Speak English less than "very well"	1157	0.07%	Speak English less than "very well"	2256	0.13%
Hindi:	6545		Hebrew:	455	
Speak English less than "very well"	866	0.05%	Speak English less than "very well"	41	0.00%
Urdu:	2053		African languages:	8889	
Speak English less than "very well"	328	0.02%	Speak English less than "very well"	2291	0.13%
<i>Spanish is the only language that triggers primary consideration</i>			Other and unspecified languages:	431	
<i>1000 is the threshold for secondary consideration (Safe Harbor)</i>			Speak English less than "very well"	163	0.01%
<i>Secondary may not be applicable in grouped categories</i>					

Triangle Regional Population by Limited English Proficiency (2009-2013 ACS Block Group)





LIMITED ENGLISH PROFICIENCY: THE IMPORTANCE OF THE SERVICE PROVIDED BY THE PROGRAM

MPO 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.

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 underserved and underrepresented population groups is part of the evaluation process for use of federal funds in three major areas: 1) an annual unified planning work program, 2) a seven-year transportation improvement program, 3) a long-range transportation plan covering 20+ years.

Inclusive public participation is a priority and 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 jurisdictions or state 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.

LIMITED ENGLISH PROFICIENCY: 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 were impractical within the scope of funding available.

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

LIMITED ENGLISH PROFICIENCY: 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 our 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 citizens, including the LEP population we serve. All language access activities detail below will be coordinated in collaboration with the MPO board and staff.

Limited English Proficiency: Providing notice to Underserved 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 (parenthesis free of charge) when advertising for public hearings were MPO related workshops.

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 board and committee meetings, workshops, forums, 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 written text from one language into another.

Ongoing MPO service standards include:

- Coordination with the City of Raleigh personnel department to provide an interpreter for phone and/or walk-in customers.
- Coordination with non-English newspapers to translate small documents - up to two pages.
- Coordination with the Gov. Morehead School to convert small documents - up to three pages - to braille provided there is a seven-day advance notice.
- 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.
- The MPO will initiate:
 - Creation of a list of inside and outside sources that can provide competent oral and written translation services
 - Analysis of the cost of these services, if any
 - Identification of potential budget and personnel limitations pertaining to these services
 - When an interpreter is needed, either in person or on the telephone, we first determine which language is required. If a translator for the required language is not available or a formal interpretation is required staff shall consider using a private translation service company.

TITLE VI/LEP STAFF TRAINING

TITLE VI / LIMITED ENGLISH PROFICIENCY: MPO STAFF TRAINING

MPO staff will be provided with the Title VI/LEP plan and will be educated on procedures and services available at least once every three 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. This information will also be part of the MPO staff orientation process for new hires within 30 days of their start date. The appeal will establish meaningful access to information and services for LEP individuals and employees in public contact positions, and those who will serve as translators for interpreters will be properly trained. Such training will be developed to ensure that staff is 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 our nondiscrimination policies and procedures. Records of staff trainings, such as agendas, sign-in sheets, copies of calendars, and certificates, will remain on file for at least three years (and in personnel files).

MPO 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.

REVIEW OF ORGANIZATIONAL DIRECTIVES

TITLE VI/LIMITED ENGLISH PROFICIENCY: MONITORING AND UPDATING

****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 making sure drafts of these documents are submitted to the Title VI Coordinator to ensure Title VI requirements are included.**

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 with the MTP update. Each update should examine all plan components, such as:

- How many LEP persons were encountered,
- Were their needs met
- What is the current LEP population of the MPO area by County
- Has there been a change to the type of languages were translation services are needed
- Has there been a change to the type of languages were translation services are needed
- Have the MPO's available resources, such as technology, staff, and financial costs, changed
- Has the MPO fulfilled the goals of the Title VI/LEP plan
- Were any complaints received

DISSEMINATION OF INFORMATION

TITLE VI/LIMITED ENGLISH PROFICIENCY: 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 our Title VI Policy Statement in public areas at our facilities, on our website, at our meetings, and prominently in any documents and reports we distribute;
- Placing notices in newspapers and publications with a large circulation among minority groups in the general vicinity of projects and activities. Ads in newspapers and other publications shall include the following:
“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 (919) 996-4400; Bonnie.Parker@campo-nc.us
- Translating information into languages other than English that meet the LEP safe harbor threshold;
- Incorporating Title VI language into our contracts and agreements (See Appendix A for Title VI Contract Language); and
- Ensuring any contractors and sub-recipients we have also disseminate Title VI information.

Please refer to our **Public Participation Plan (PPP)** for additional outreach methods we employ to comply with Title VI. Our PPP can be found at www.campo-nc.us.

The MPO will post the Title VI/LEP plan on its 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. Copies of the Title VI/LEP plan are provided to each member jurisdiction's personnel department, NCDOT, FHWA, FTA, and any person or agency requesting a copy. Each MPO sub recipient will be provided a copy and will be educated on the importance of complying with Title VI and providing language assistance.

EXTERNAL DISCRIMINATION COMPLAINT PROCEDURES

INTRODUCTION

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.

PURPOSE

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

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

Complaints may be submitted to the following entities:

- **NORTH CAROLINA CAPITAL AREA MPO**
NC Capitol Area MPO, ATTN: Title VI Compliance, 421 Fayetteville St., Suite 203; Raleigh, NC 27601; (919) 996-4400
 - **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. **Format for Complaints** – Complaints shall be in writing and signed by the complainant(s) or a representative and include the complainant’s name, address, and telephone number. Complaints received by fax or e-mail will be acknowledged and processed. Allegations received by telephone or in person will be reduced to writing, may be recorded and will be provided to the complainant for confirmation or revision before processing. Complaints will be accepted in other languages including Braille.
 5. **Complaint Basis** – Allegations must be based on issues involving race, color, national origin, sex, age, or disability. The term “basis” refers to the complainant’s membership in a protected group category.

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

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

COMPLAINT LOG

1. When a complaint is received by CAMPO, the complaint will be entered into the Discrimination Complaints Log with other pertinent information and assigned a Case Number. (Note: All complaints must be logged).
2. The complaints log will be submitted to the NCDOT's Civil Rights office during Title VI compliance reviews. (Note: NCDOT may also be request the complaints log during pre-grant approval processes).
3. The Log Year(s) since the last submittal will be entered (e.g., 2012-2015, 2014-2015, FFY 2015, or 2015) and the complaints log will be signed before submitting the log to NCDOT.
4. When reporting no complaints, check the No Complaints or Lawsuits box and sign the log.

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

COMPLIANCE AND ENFORCEMENT PROCEDURES

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 & activities related to Title VI.

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;
- c. occurred until satisfactory assurance of future compliance has been received from the recipient.
- d. Taking such other action that may be deemed appropriate under the circumstances, until compliance or remedial action has been accomplished by the recipient.
- e. Referring the case to the FHWA for appropriate administrative or legal proceedings.
- f. Other means authorized by law.

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

- a. Canceling, terminating, or suspending the contract or agreement with the consultant/contractor in whole or in part.
- b. Taking such other action that may be deemed appropriate under the circumstances.
- c. Referring the case to the NCDOT for appropriate administrative or legal proceedings.

Additional Considerations

The MPO shall also make a special effort to seek out and consider the needs of groups or communities traditionally not well-served by existing transportation systems. These include, but are not limited to, low-income households and minority households. To assure adequate participation of these groups, the MPO shall use tools such as advisory boards (whose members shall be either low-income or minority individuals, or represent low-income or minority groups), target mailing list, workshops, and public notices in minority or low-income targeted media outlets.

The MPO's efforts in this regard shall be consistent with the Environmental Justice Executive Order (EO 12898) dated February 11, 1994, and other related guidance from the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA).

The MPO shall also make a special effort to seek out and consider the needs of individuals or communities with Limited English Proficiency. The MPO efforts in this regard shall be consistent with the signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," dated August 11, 2000, and other related guidance from the FHWA and FTA.

Federal regulations define Persons with Limited English Proficiency as individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service or benefit in federally-funded programs and activities.

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

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
421 Fayetteville Street, Suite 203
Raleigh, NC 27601
(919) 996-4400 Telephone
(919) 996-1735 Facsimile
Bonnie.Parker@campo-nc.us

I. Appendices A-E: Standard Title VI Assurances, Forms, and Procedures

Standard Title VI Assurances

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

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

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

The 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, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

3. That the Recipient shall insert the clauses of Appendix A of this assurance in every contract subject to the Act and the Regulations.
4. That the Recipient shall insert the clauses of Appendix B of this assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.

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

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

Signed this _____ day of _____, 20_____.

Director, NC Capital Area MPO

(1)

*The following items
(Compliance, Real Estate-
Outright, Real Estate Not
Outright) must be included with
all of MPO contracts for
services as applicable*

Compliance

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

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

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

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

(4) **Information and Reports:** The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the North Carolina Department of Transportation or the Federal Highway Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall so certify to the North Carolina Department of Transportation, or the Federal Highway Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

(5) **Sanctions for Noncompliance:** In the event of the contractor’s noncompliance with the nondiscrimination provisions of this contract, the North Carolina Department of Transportation shall impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:

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

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

Real Estate-Outright

The following clauses shall be included in any and all deeds effecting or recording the transfer of real property, structures or improvements thereon, or interest therein from the United States.

(GRANTING CLAUSE)

NOW, THEREFORE, the Department of Transportation, as authorized by law, and upon the condition that NCDOT will accept title to the lands and maintain the project constructed thereon, in accordance with Title 23, United States Code, the Regulations for the Administration of Federal-Aid for Highways and the policies and procedures prescribed by Federal Highway Administration of the Department of Transportation and, also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the state of North Carolina all the right, title and interest of the Department of Transportation in and to said lands described in Exhibit "A" attached hereto and made a part hereof.

(HABENDUM CLAUSE)

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

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

Real Estate-Not Outright

The following clauses shall be included in all deeds, licenses, leases, permits or similar instruments entered into by the North Carolina Department of Transportation pursuant to the provisions of Assurance 6(a).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add “as a covenant running with the land”] that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation program or activity is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

That in the event of breach of any of the above nondiscrimination covenants, the STATE shall have the right to terminate the {license, lease, permit, etc.] and to re-enter and repossess said land and the facilities thereon, and hold the same as if said [licenses, lease, permit, etc.] had never been made or issued.

That in the event of breach of any of the above nondiscrimination covenants, the STATE shall have the right to re-enter said lands and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of the STATE and its assigns.

The following shall be included in all deeds, licenses, leases, permits, or similar agreements entered into by the North Carolina Department of Transportation pursuant to the provisions of Assurance 6(b).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds, and leases add “as a covenant running with the land”) that (1) no person on the ground of race, sex, age, color, disability, or national origin shall be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over or under such land and the furnishing of services thereon, no person on the ground of race, sex, age, color, disability, or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) shall use the premises in compliance with all other requirements imposed by or pursuant to Title 49, Code of Federal Regulations. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964), and as said Regulations may be amended.

That in the event of breach of any of the above nondiscrimination covenants, STATE shall have the right to terminate the [license, lease, permit, etc.] and to re-enter and repossess said land and the facilities thereon, and hold the same as if said [license, lease, permit, etc.] had never been made or issued.

That in the event of breach of any of the above nondiscrimination covenants, the STATE shall have the right to re-enter said land and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of the STATE and its assigns.

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

The following sections (Title VI Notice, Title VI Voluntary Public Involvement Form) are to be used as often as possible in subcommittee, citizen committees, and any “publicly” open committee or workgroup the MPO sets up.

Information voluntarily give will be compared with “study or work area” demographics to determine whether sufficient representation is being sought/utilized.

If sufficient representation of Minority/Low-Income/or Title VI protected classes is not being met, the MPO is required to make additional outreach in an attempt to provide membership invitations on committees etc to Title VI classes etc.

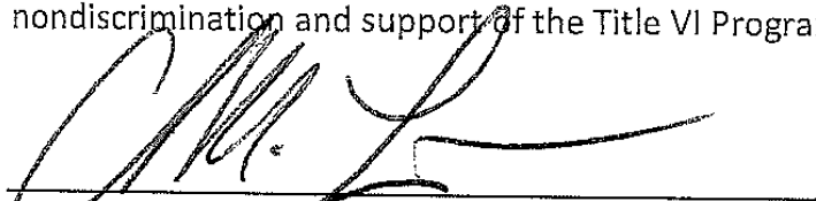
NC CAPITAL AREA MPO TITLE VI NOTICE TO THE PUBLIC

U.S. Department of Justice regulations, 28 Code of Federal Regulations, Section 42.405 It is the policy of the **Capital Area Metropolitan Planning Organization (CAMPO)**, as a federal-aid recipient, to ensure that no person shall, on the ground of **race, color, national origin, Limited English Proficiency, sex, age, or disability, (and low-income, where applicable)**, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of our programs and activities, as provided by Title VI of the Civil Rights Act of 1964, Executive Orders 12898 and 13166, the Civil Rights Restoration Act of 1987, and other pertinent nondiscrimination authorities.

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

Bonnie Parker
One City Plaza
421 Fayetteville Road, Suite 203,
Raleigh, N.C. 27601
(919) 996-4400
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

December 5, 2018

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 Departamento de Transporte de Carolina del Norte notifica públicamente que es política del Departamento 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. El Departamento 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 del Departamento 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 NCDOT 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 NCDOT. Cualquier queja debe ser por escrito o en persona con MPO, **NC Capitol Area MPO, ATTN: Title VI Compliance, 421 Fayetteville St., Suite 203, Raleigh, NC 27601**, 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 Derechos Civiles sin costo alguno o llamando al **919-996-4400**, o a través de Internet en www.campo-nc.us.

Title VI Voluntary Public Involvement Forms

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 meeting.

Meeting or Event: Location:	Date:
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In accordance with Title VI of the Civil Rights Act of 1964 and related authorities, the Capital Area Metropolitan Planning Organization (CAMPO) assures that no person(s) shall be excluded from participation in any of its programs or activities based on their race, color, national origin, disability, age, gender, or income. Completing this form helps us meet our data collection and public involvement obligations and will help us to better serve you.

Please place your completed form in the designated box on the sign-in table, give it to a CAMPO official or mail it to the Capital Area Metropolitan Planning Organization, 421 Fayetteville St., Ste. 203, Raleigh, NC 27601. All forms will remain on file at the CAMPO as part of the public record.

Zip Code: _____	Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female
Street Name: (i.e. Main Street) _____	Have a Disability: <input type="checkbox"/> Yes <input type="checkbox"/> No
Total Household Income: <input type="checkbox"/> Less than \$12,000 <input type="checkbox"/> \$47,000 – \$69,999 <input type="checkbox"/> \$12,000 – \$19,999 <input type="checkbox"/> \$70,000 – \$93,999 <input type="checkbox"/> \$20,000 – \$30,999 <input type="checkbox"/> \$94,000 – \$117,999 <input type="checkbox"/> \$31,000 – \$46,999 <input type="checkbox"/> \$118,000 or greater	Age: <input type="checkbox"/> Less than 18 <input type="checkbox"/> 45-64 <input type="checkbox"/> 18-29 <input type="checkbox"/> 65 and older <input type="checkbox"/> 30-44
Race/Ethnicity: <input type="checkbox"/> White <input type="checkbox"/> Black/African American <input type="checkbox"/> Asian <input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Native Hawaiian/Pacific Islander <input type="checkbox"/> Hispanic/Latino <input type="checkbox"/> Other (please specify): _____	National Origin: (if born outside the U.S.) <input type="checkbox"/> Mexican <input type="checkbox"/> Central American: _____ <input type="checkbox"/> Puerto Rican <input type="checkbox"/> South American: _____ <input type="checkbox"/> Chinese <input type="checkbox"/> Vietnamese <input type="checkbox"/> Korean <input type="checkbox"/> Other (please specify): _____

Thank you for your participation!

For more information regarding Title VI or this request, please contact Bonnie Parker, Title VI Coordinator at 919.996.4400, or by email at bonnie.parker@campo-nc.us.

Título VI Encuesta De Participación Pública

El llenado de este formato es completamente voluntario. Usted no está obligado a proporcionar la información solicitada con el fin de participar en esta reunión.

La Reunión o Evento:	Fecha:
Lugar de la Reunión:	

De conformidad con el Título VI del Acta de Derechos Civiles de 1964 y otras disposiciones de derechos civiles de la ley Federal estatutaria, el Organización de Planificación Metropolitana Región de la Capital (CAMPO) asegura que ninguna persona(s) afectada por sus programas, políticas o actividades, quedarán excluidos de su participación en, negada de los beneficios de, o sometidos a la discriminación por motivos de raza, color, origen nacional, discapacidad, edad, ingresos o género.

Por favor deposite el formato llenado en la casilla designada en la mesa de registro, darle a un funcionario CAMPO, o envíe por correo a Capital Area Metropolitan Planning Organization, 421 Fayetteville St., Ste. 203, Raleigh, NC 27601. Los formatos completados serán guardados en los archivos de CAMPO como parte del registro público.

Código Postal: _____	Sexo: <input type="checkbox"/> Masculino <input type="checkbox"/> Femenino
Nombre de la Calle: (ej. Main Street) _____	Discapacidad: <input type="checkbox"/> Sí <input type="checkbox"/> No
Ingreso Total del Hogar: <input type="checkbox"/> Menos de \$12,000 <input type="checkbox"/> \$47,000 – \$69,999 <input type="checkbox"/> \$12,000 – \$19,999 <input type="checkbox"/> \$70,000 – \$93,999 <input type="checkbox"/> \$20,000 – \$30,999 <input type="checkbox"/> \$94,000 – \$117,999 <input type="checkbox"/> \$31,000 – \$46,999 <input type="checkbox"/> \$118,000 o Mayor	Edad: <input type="checkbox"/> Menor de 18 <input type="checkbox"/> 45-64 <input type="checkbox"/> 18-29 <input type="checkbox"/> 65 o Mayor <input type="checkbox"/> 30-44
Raza/Etnicidad: <input type="checkbox"/> Blanco <input type="checkbox"/> Afro Americano <input type="checkbox"/> Asiático <input type="checkbox"/> Indio Americano/Nativo de Alaska <input type="checkbox"/> Nativo de Hawaii/Islas del Pacífico <input type="checkbox"/> Hispano/Latino <input type="checkbox"/> Otra (por favor especifique): _____	Nacionalidad de Origen: (Si nació fuera de los EU) <input type="checkbox"/> Mexicano <input type="checkbox"/> Centro Americano: _____ <input type="checkbox"/> Sudamericano: _____ <input type="checkbox"/> Puertorriqueño <input type="checkbox"/> Chino <input type="checkbox"/> Vietnamita <input type="checkbox"/> Coreano <input type="checkbox"/> Otro (por favor especifique): _____

¡Gracias por su cooperación!

Para más información relacionada con el Título VI o este proceso, por favor contacte a NCDOT Sección Título VI al teléfono (919) 508-1808 o llame sin costo al 919.996.4400, o por correo electrónico bonnie.parker@campo-nc.us.

INTERNAL COMPLAINT PROCESS

1. **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.
2. **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 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 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

1. 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.

2. 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.

3. 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.

4. 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 will review the file and investigative report. Subsequent to the review, the Executive Director 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.

DISCRIMINATION COMPLAINT FORM

Any person who believes that he/she has been subjected to discrimination based upon race, color, sex, age, national origin, or disability may file a written complaint with Capital Area MPO, within 180 days after the discrimination occurred.

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

Identify the Category of Discrimination:

<input type="checkbox"/> RACE	<input type="checkbox"/> COLOR	<input type="checkbox"/> NATIONAL ORIGIN	<input type="checkbox"/> AGE
<input type="checkbox"/> RELIGION	<input type="checkbox"/> DISABILITY	<input type="checkbox"/> SEX/GENDER	

Identify the Race of the Complainant

<input type="checkbox"/> Black	<input type="checkbox"/> White	<input type="checkbox"/> Hispanic	<input type="checkbox"/> Asian American
<input type="checkbox"/> American Indian	<input type="checkbox"/> Alaskan Native	<input type="checkbox"/> Pacific Islander	<input type="checkbox"/> Other _____

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

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

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

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

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

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

DISCRIMINATION COMPLAINT FORM

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

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

Have you discussed the complaint with any CAMPO 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:

Capital Area MPO
ATTN: Title VI
421 Fayetteville St., Ste 203
RALEIGH, NC 27601
919.996.4000

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: ☐ NCDOT ☐ FTA Date Referred: _____

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 otra 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; 421 Fayetteville Street, Suite 203; Raleigh, NC 27601; (919) 996-4400
- **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



NC Capital Area Metropolitan Planning Organization

North Carolina Capital Area MPO

FORMATO DE QUEJAS POR DISCRIMINACIÓN

Apellido:		Nombre:		<input type="checkbox"/> Hombre
				<input type="checkbox"/> Mujer
Dirección:		Ciudad	Estado	Código Postal
Teléfono de Casa:	Teléfono de Trabajo:	Dirección de correo electrónico		
Identificar la categoría de la Discriminación: <div> <input type="checkbox"/> RAZA <input type="checkbox"/> COLOR <input type="checkbox"/> ORIGEN NACIONAL <input type="checkbox"/> EDAD <input type="checkbox"/> RELIGIÓN <input type="checkbox"/> DISCAPACIDAD <input type="checkbox"/> SEXO/GÉNERO </div>				
Identificar la Raza del Demandante <div> <input type="checkbox"/> Afro Americano <input type="checkbox"/> Blanco <input type="checkbox"/> Hispano <input type="checkbox"/> Asiático Americano <input type="checkbox"/> Indio Americano <input type="checkbox"/> Nativo de Alaska <input type="checkbox"/> Islas del Pacífico <input type="checkbox"/> Otra _____ </div>				
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.				

FORMATO DE QUEJAS POR DISCRIMINACIÓN

¿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 _____
- ☐ Administración de Carreteras Federales _____
- ☐ 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
421 Fayetteville St., Suite 203
Raleigh, NC 27601

Telephono (919) 996-4400 o Fax (919) 996-1735

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: 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 INVESTIGATION COMPLETED	DISPOSITION

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 **CAMPO** 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