

Title VI Program Plan

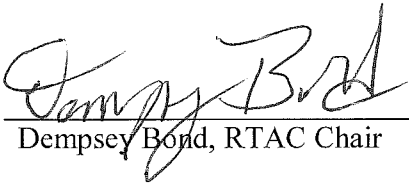
Mid-East Rural Transportation Planning Organization



08/12/2019

PLAN REVIEW AND APPROVAL

On behalf of the Governing Board for the Mid-East Rural Transportation Planning Organization (RPO), I hereby acknowledge receipt of the Title VI Nondiscrimination Plan. We, the Governing Board, have reviewed and hereby approve this Plan. We are committed to ensuring that all decisions are made in accordance with the nondiscrimination guidelines of this Plan, to the end the no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any RPO transportation related services and activities on the basis of race, color, national origin, sex, age, religion, or disability, as protected by Title VI of the Civil Rights Act of 1964 and the nondiscrimination provisions of the Federal Highway Administration and the North Carolina Department of Transportation.



Dempsey Bond, RTAC Chair

August 12, 2019

Date

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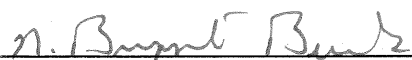
TITLE VI POLICY STATEMENT AND NOTICE OF NONDISCRIMINATION

It is the policy of the Mid-East Commission RPO (MERPO), 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.

Eliud De Jesus
1502 N Market Street, Suite A Washington, NC 27889
252-974-1857
edejesus@mideastcom.org

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



N. Bryant Buck, Executive Director
Mid-East Council of Governments

August 12, 2019

Date

Implementation (Dissemination)

- This Policy Statement contains contact information for the Title Coordinator, and it will also serve as our notice to public.
- This statement will be signed by the Executive Director of the Mid-East Council of Government, 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.

STANDARD USDOT TITLE VI ASSURANCES

Please refer to Appendix 1 of this Plan for a copy of our completed, signed USDOT Title VI Assurances.

ORGANIZATION & STAFFING

Rural Planning Organizations (RPOs) were established by the State of North Carolina in recognition of the need for more coordinated transportation planning in rural areas not within an MPO. An RPO is a voluntary organization of local officials formed through a Memorandum of Understanding to work cooperatively with NCDOT to plan rural transportation systems and to advise NCDOT on rural transportation policy. GS 136-212 identifies four primary duties for RPO's: 1) Develop, in cooperation with NCDOT, long-range, local and regional multimodal transportation plans, 2) Provide a forum for public participation in the transportation planning process, 3) Develop and prioritize suggestions for transportation projects the organization believes should be included in the State's Transportation Improvement Program, and 4) Provide transportation-related information to local governments and other interested organizations and persons. According to GS 136-211 (b), Rural Transportation Planning Organizations shall include representatives from contiguous areas in three to fifteen counties, or a total population of the entire area represented of at least 50,000 persons according to the latest population estimate of the Office of State Budget and Management. RPOs receive SPR funds from NCDOT's Transportation Planning Division (TPD).

The Mid-East RPO was established in 2002. Our planning area includes the following counties: Beaufort, Martin, and Pitt. Our Transportation Advisory Committee (TAC) has 7 members and meets quarterly. Our Technical Coordinating Committee (TCC) has 28 members and meets quarterly. Please refer to **Appendix 2** for lists of current TAC and TCC.

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 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 one, which consists of the following job categories:

The MERPO currently employs a fulltime RPO Director.

An organizational chart showing the Title VI Coordinator’s place within the organization is located in **Appendix 3**.

ENVIRONMENTAL JUSTICE (EJ)

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

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

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

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

- (1) Identifying and evaluating environmental, public health, and interrelated social and economic effects of our programs, policies and activities;
- (2) Proposing measures to avoid, minimize and/or mitigate disproportionately high and adverse environmental and public health effects, and interrelated social and economic effects, and providing offsetting benefits and opportunities to enhance communities, neighborhoods, and individuals affected by our programs, policies and activities, where permitted by law;
- (3) Considering alternatives to proposed programs, policies, and activities, where such alternatives would result in avoiding and/or minimizing disproportionately high and adverse human health or environmental impacts to minority and/or low-income populations; and
- (4) Eliciting public involvement opportunities and considering the results thereof, including soliciting input from affected minority and low-income populations in considering alternatives.
- (5) Adding an EJ section to plans and studies undertaken by the RPO.

EJ analyses will be conducted to determine if our programs, policies, or activities will result in disproportionately high and adverse human health and environmental effects on minority populations and low-income populations. EJ applies to our policies, such as where public meetings will be held, and our projects, such as when we plan to construct or expand a facility. Thus, we will look at various alternatives and seek input from potentially affected communities before making a final decision. Demographic data will be collected to document public involvement in the decision-making process. EJ analyses will remain on file indefinitely, and copies will be provided to NCDOT, upon request, during compliance reviews or complaint investigations. (See **Appendix 4** – Tables for Race/Ethnicity and Poverty)

DATA COLLECTION/ANALYSIS/REPORTING

Data collection, analysis and reporting are key elements of a successful Title VI enforcement strategy. To ensure that Title VI reporting requirements are met, Mid-East RPO 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 Appendix 4 for demographic tables on Race & Ethnicity, Age & Sex, Disability, Poverty, and Household Income.

Population Locations

Recipients of FHWA funds are required to identify the characteristics and locations of populations they serve, particularly by race/ethnicity, poverty and limited English proficiency. We will document this narratively or through maps that overlay boundaries and demographic features on specific communities, and provide this information to NCDOT, upon request. (See Appendix 5 – Demographic Maps)

It should be noted that in many places the MERPO planning area boundary does not follow US Census Bureau geography boundaries. See Appendix 4 for the methodology used to approximate MERPO demographic data values.

LIMITED ENGLISH PROFICIENCY (LEP)

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

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

Four Factor Analysis

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

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

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

An analysis of the MERPO service area determined that the LEP Spanish speaking population exceeds the safe harbor threshold. As indicated in the table below, the number of Spanish speaking individuals who speak English less than very well exceeds 1,000 individuals. Population characteristics will be reevaluated when 2020 Census data becomes available.

Table 6-1: Limited English Proficiency

Language spoken at home	Estimate	Percentage
Total Population (5 years and over)	106387	100.0%
Speak only English	104173	97.9%
Spanish	5212	4.9%
Speak English "very well"	2683	2.5%
Speak English "less than very well"	2529	2.4%
Other Indo-European language	632	0.6%
Speak English "very well"	496	0.5%
Speak English "less than very well"	136	0.1%
Asian and Pasific Island languages	250	0.2%
Speak English "very well"	191	0.2%
Speak English "less than very well"	59	0.1%
Other languages	161	0.2%
Speak English "very well"	111	0.1%
Speak English "less than very well"	50	0.0%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates, Table B16004.

Methodology:

Data used for the above table was sourced from the U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates, Table B16004. Data was analyzed at the Census Block Groups geographic level. Using census tracts provides more detailed and useful information than using County or Census tract level data. However, it may present a challenge when counties are only partially in the RPO Planning Area. This is the case for Pitt County, which, unlike Martin and Beaufort Counties, have portions of their county in the Greenville Area Metropolitan Planning Organization (GUAMPO). MPO Planning Area boundaries do not always follow census boundaries, which means several census block groups are split, with part being in the MPO(s) Planning Area(s) and part being in the RPO Planning Area. In these cases values in the following demographic tables are estimates based on the Census Block Groups that are most closely associated with the population within the MERPO planning area (See Appendix 4). Currently, the Mid-East RPO is looking for solutions to modify Census layers so that they take into consideration the MPOs and RPOs boundaries. Through periodic updates, this table and the accompanying map will be updated if more accurate data becomes available.

Results:

The only language group in the RPO Planning Area that reaches the threshold of 5% or 1,000 persons is Spanish, with over 5,212 totals, of which 2,529 (~2.4%) indicated they speak English “less than very well”. Almost half of the Spanish speaking people in the Planning Area are bilingual; with nearly 2,683 indicating they speak English “very well”, while just over 2,529 indicate they speak English “less than very well”. This total is well above the Safe Harbor

Threshold of 1,000 persons or 5% and represents a significant population group. All other language groups total less than 1,000, and do not meet the threshold of 5% or 1,000 persons, including with the margin of error (MOE) added in. Significant concentrations occur in eastern Pitt County, northwestern Beaufort County, northeastern Beaufort County, and southwestern Martin County. These are areas with high proportions of agricultural production such as traditional row farming and construction trades. Many of the largest agricultural industries in the state are located in these areas, and many Spanish speaking individuals are employed at these facilities. This presents an opportunity to partner with these facilities should targeted advertising be deemed appropriate in certain planning activities.

Factor #2: *The frequency with which LEP individuals come in contact with the program.*

The MERPO has no frequency of contact from LEP populations to report from the last several years. The main opportunity for contact for LEP populations is attending MERPO committee meetings. TCC and TAC meetings are held 4 times per year. These public meetings provide 8-10 potential opportunities for LEP individuals to come into contact with the MERPO annually. The LEP individuals could also contact the Mid-East RPO every day of the week during regular office hours (8:00am to 5:00pm).

Factor #3: *The nature and importance of the program, activity, or service provided by the recipient to people's lives.*

The Mid-East Rural Transportation Planning Organization (MERPO) serves as the intergovernmental organization for local elected officials, the North Carolina Department of Transportation and residents of the region to work cooperatively to address transportation issues within the MERPO boundary.

The goals and duties of the MERPO are to: Develop long-range local and regional transportation plans (highways, railways, aviation and ferries) in cooperation with other area planning organizations and the North Carolina Department of Transportation; Provide a forum for public participation in the rural transportation planning process; Develop and prioritize transportation projects which the MERPO believes should be included in the State Transportation Improvement Program; Provide transportation-related information to local governments and other interested organizations and persons; and Conduct transportation related studies and surveys for local governments and other interested entities/organizations. This program works to further connect these rural areas and populations. Their participation could improve and change decisions during the crafting of a plan or process.

Factor #4: *The resources available to the recipient and costs.*

In many cases, NCDOT has primary responsibility for the activities that are most important to LEP persons, such as Comprehensive Transportation Plans and TIP project development. In these cases, MERPO has a support role and will rely on resources available from NCDOT as the project lead. In situations where MERPO has lead responsibility for an activity, or is helping a local government or local agency with an activity, we have access to the following available resources to reach out to the LEP community:

- NCDOT Public Involvement Unit contact lists for translation services and Spanish language media outlets
- Spanish-speaking staff
- Online translation resources

Any costs related to these translation services will be billed as regular MERPO expenses eligible for 80% reimbursement from NCDOT.

LANGUAGE ASSISTANCE PLAN

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

Language Assistance Measures

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

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

Specific Measures by Language Group

- Spanish: The previous measures will be considered for the Spanish speaking population which is the only group that has exceeded the safe harbor threshold.

Written Translation and Oral Interpretation

Vital documents will be translated for each eligible LEP language group in our service area that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be encountered. Translated materials will be placed online and in appropriate public (or private) places accessible to LEP persons. The safe harbor provisions apply to the translation of written documents only, and do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. When appropriate, translation of any document will be communicated orally in the appropriate language.

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

Staff Support for Language Assistance

- Our staff will be provided a list of referral resources that can assist LEP persons with written translation and oral interpretation, including the Title VI Coordinator and consultants available for contracting to provide LEP services. This list will be updated as needed to remain current.
- All main offices will have available language assistance flashcards and materials translated into the languages that meet the safe harbor threshold. When encountering an LEP person, staff should present the individual with an iSpeak flashcard and let them choose the language. Do not assume their preferred language. Assistance may be sought from bilingual staff fluent in the identified language (if available) before contacting a referral resource. Document the encounter and report it to the Title VI Coordinator.
- Training: All employees will be instructed on our procedures for providing timely and reasonable assistance to LEP persons. New employee orientation will also explain these procedures to new hires. Staff routinely encountering LEP persons by telephone or in person will receive annual refresher training. All other employees will be reminded of LEP through annual Title VI program acknowledgements and basic Title VI trainings.

Project-Specific LEP Outreach

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

Monitoring and Updating the Language Assistance Plan

Monitoring of daily interactions with LEP persons will be continuous, thus language assistance techniques may be refined at any time. This Plan will be periodically reviewed—at least annually—to determine if our assistance measures and staff training are working. Resource availability and feedback from agency staff and the general public will be factors in the evaluation and any proposed updates. Among other practices, this process will include working with LEP community contacts to determine if our employees are responding appropriately to requests made with limited English or in languages other than English, and observing how agency staff responds

to requests, including observing drivers or surveying riders. To the best of our ability, we will attempt to never eliminate a successful existing LEP service. Significant LEP program revisions will be approved or adopted by our board or designated official and dated accordingly. LEP data and procedures will be reviewed and updated at least once every three years.

DISSEMINATION OF TITLE VI INFORMATION

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

- Visibly posting our Title VI Policy Statement in public areas at our facilities, on our website, at our meetings, and prominently in any documents and reports we distribute;
- Placing notices in newspapers and publications with a large circulation among minority groups in the general vicinity of projects and activities. Ads in newspapers and other publications shall include the following:

“The Mid-East RPO 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 252-974-1857; edejesus@mideastcom.org.”
- 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 C of Appendix 1, USDOT Standard Title VI Assurances, for Title VI Contract Language); and
- Ensuring any contractors and sub-recipients we have also disseminate Title VI information.

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

EXTERNAL DISCRIMINATION COMPLAINT PROCEDURES

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

FILING OF COMPLAINTS

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

Complaints may be submitted to the following entities:

- **Mid-East Commission**, Mid-East Rural Planning Organization, 1502 N Market Street, Suite A, Washington, NC 27889; 252-946-8043
 - **North Carolina Department of Transportation**, Office of Civil Rights, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or toll free 800-522-0453
 - **Federal Highway Administration**, North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010
 - **US Department of Transportation**, Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202-366-4070
 - **US Department of Justice**, Special Litigation Section, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, DC 20530, 202-514-6255 or toll free 877-218-5228
- 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
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. <i>(Executive Order 13166)</i>
Color	Color of skin, including shade of skin within a racial group	Black, White, brown, yellow, etc.	
National Origin (<i>LEP</i>)	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, an Acknowledgment Letter and a Complainant Consent/Release Form will be mailed to the complainant within ten (10) business days by registered mail.
2. We will consult with the NCDOT Title VI Program to determine the acceptability and jurisdiction of all complaints received. (Note: If NCDOT will investigate, the Title VI Program will be responsible for the remainder of this process. We will record the transfer of responsibility in our complaints log).
3. Additional information will be requested if the complaint is incomplete. The complainant will be provided 15 business days to submit any requested information and the signed Consent Release form. Failure to do so may be considered good cause for a determination of no investigative merit.

4. Upon receipt of the requested information and determination of jurisdiction, we will notify the complainant and respondent of whether the complaint has sufficient merit to warrant investigation.
5. If the complaint is investigated, the notification shall state the grounds of our jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
6. If the complaint does not warrant investigation, the notification to the complainant shall specifically state the reason for the decision.

Complaint Log

1. When a complaint is received, the complaint will be entered into the Discrimination Complaints Log with other pertinent information and assigned a **Case Number**. (Note: All complaints must be logged).
2. The complaints log will be submitted to the NCDOT's Civil Rights office during Title VI compliance reviews. (Note: NCDOT may also request the complaints log during pre-grant approval processes).
3. When reporting **no complaints**, check the **No Complaints or Lawsuits** box and sign the log.

Please refer to **Appendix 6** for a copy of our Discrimination Complaint Form, Complaints Log, and Sample Investigation Template.

REVIEW OF ORGANIZATIONAL DIRECTIVES

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

TITLE VI TRAINING

All employees will receive basic Title VI training at least once every three years. New hires will receive this training within 30 days of their start date. Basic training will cover all sections of this Plan and our overall Title VI obligations. Staff may receive specialized training on how Title VI applies to their specific work areas. Those who routinely encounter the public, such as office personnel, call center staff, and vehicle drivers, will receive annual refresher training. Trainings will be provided or organized by the Title VI Coordinator and will often coincide with updates to our nondiscrimination policies and procedures. Records of staff trainings, such as agendas, sign-in sheets, copies of calendars, and certificates, will remain on file for at least three years (and in personnel files).

COMPLIANCE AND ENFORCEMENT PROCEDURES

FHWA recipients must have mechanisms in place to enforce compliance with Title VI. The Mid-East RPO utilizes internal training, meetings, monitoring contractors, technical assistance, and

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

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

To ensure compliance with Title VI, MERPO will take proactive steps to prevent discrimination in our programs and activities, including the following:

- | | |
|---|---|
| <input type="checkbox"/> Conduct periodic Title VI training; | <input type="checkbox"/> Customize public outreach according to the situation or community at hand; |
| <input type="checkbox"/> Address Title VI issues at staff meetings; | <input type="checkbox"/> Build a system of mutual trust and two-way communication with the public; |
| <input type="checkbox"/> Participate or cooperate during compliance reviews conducted by NCDOT; | <input type="checkbox"/> Maintain pertinent demographic data (statistical); |
| <input type="checkbox"/> Inform and monitor any consultants/contractors regarding their Title VI obligations, including review of contracts for nondiscrimination language; | <input type="checkbox"/> Ensure policies and procedures support and comply with Title VI; |
| | <input type="checkbox"/> Document processes & activities related to Title VI. |

If MERPO 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.

**Appendix 1 - United States Department of Transportation
STANDARD TITLE VI / NONDISCRIMINATION ASSURANCES**

DOT Order No. 1050.2A

The *Mid-East RPO* (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through **Federal Highway Administration (FHWA)**, is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Nondiscrimination in Federally Assisted Programs of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964).

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

General Assurances

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

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

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

Specific Assurances

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

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with

regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

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

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

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

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

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

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

Mid-East Rural Planning Organization (MERPO)

by *N. Bryant Burch*
Executive Director, Mid-East Council of Governments

DATED August 12, 2019

Attachments:

Appendices A, B, C, D, E

APPENDIX A

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 (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration (FHWA), as they may be amended from time to time, 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, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, 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 will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Nondiscrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the FHWA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the FHWA, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FHWA may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B: CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

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

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

(HABENDUM CLAUSE)

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

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

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

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

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered by the *Mid-East RPO (MERPO)* pursuant to the provisions of Assurance 7(a):

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

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

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

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered by the *Mid-East RPO (MERPO)* pursuant to the provisions of Assurance 7(b):

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

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

APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following nondiscrimination statutes and authorities; including but not limited to:

Pertinent Nondiscrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Nondiscrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Nondiscrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

Appendix 2 - TAC and TCC Members and Responsibilities

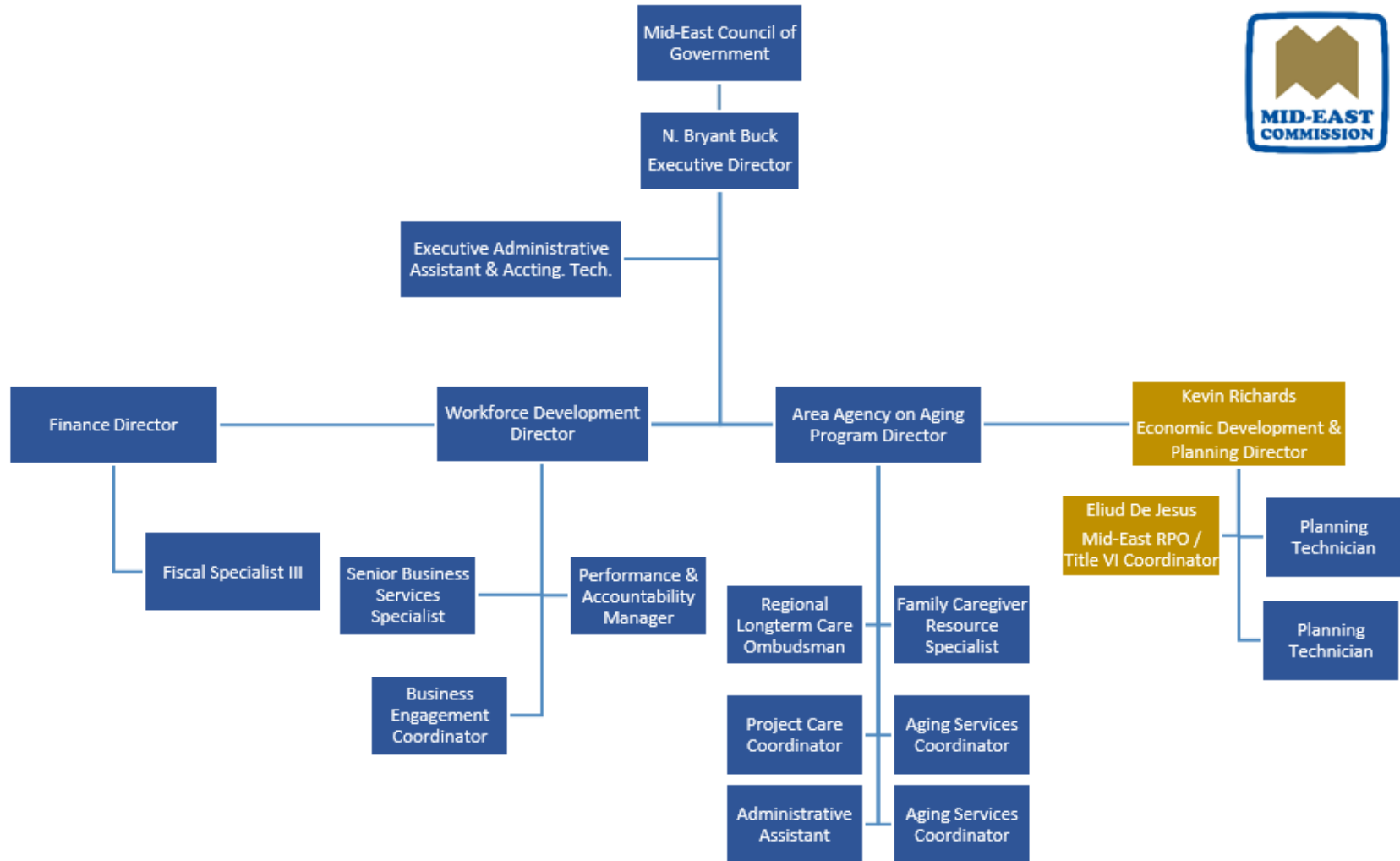
The governing board of the MERPO is the Rural Transportation Advisory Committee (TAC), a board of county and municipal elected officials from the MERPO counties. The RTAC holds 4 meetings per year, as does the Rural Transportation Coordinating Committee (TCC), a committee of staff representatives from the MERPO counties, municipalities, rural transit systems, Mid-East Council of Governments, and NCDOT that provides technical recommendations to the governing board.

Mid-East RPO TAC	
Name	Appointed By
Dempsey Bond (Chair)	Martin County
Tom Coulson	Pitt County
Donald Alexander Albright	Pitt County
Jerry Evans	Beaufort County
Charlotte Griffin	Town of Bear Grass – Martin County Municipal Representative
Tom Richter	Town of Washington Park – Beaufort County Municipal Representative
Allen Moran	NC DOT – Division 1 BOT Rep
Hugh Overholt	NC DOT – Division 2 BOT Rep

Mid-East RPO TCC	
Name	Organization/Position
Hood Richardson	Beaufort County
David Bone	Martin County - Manager
Scott Elliott	Pitt County - Manager
Judi Lannon	Town of Aurora
Frank Halsey Jr.	Martin County Transit
John O'Daniel	Town Administrator of Williamston - Manager
Jonathan Russell	City of Washington - Manager
Rhonda Suggs	Beaufort Area Transit System
Gil Alligood	City of Washington / Airport
Brian Alligood	Beaufort County - Manager
Cameron Brady	Town of Williamston - Planner
John Rodman	City of Washington - Planning Director
James Rhodes	Pitt County - Planning Director
Jonas Hill	Pitt County - Planner
Betty Moore	Beaufort County
Ryan Purtle	Greenville Urban Area MPO
Glen Moore	City of Washington - Planner
Robert Cayton	Beaufort County
Ricky Credle	Town of Belhaven - Mayor
Allison Stalls	Town of Robersonville
Jerry McCrary	Town of Parmele
Lynn Davis	Town of Belhaven - Manager

Michelle Howes	NC DOT TPB - RPO Coordinator
Gretchen Byrum	NC DOT Division 1 - Division Project Engineer
Len White	NC DOT Division 2 - Division Project Engineer
Diane Hampton	NC DOT Division 2 - Division Corridor Engineer
Cam Coburn	Pitt Area Transit System
Justin Oakes	Town of Farmville - Planner
David Hodgkins	Town of Farmville - Manager

Appendix 3 - Organizational Chart



Appendix 4 - Demographic Tables

The Mid-East RPO boundary does not follow Census Bureau geographies; therefore, values in the following demographic tables are estimates based on the Census Block Groups or Tracts (as indicated in the Methodology below) that are most closely associated with the population within the MERPO planning area.

Race and Ethnicity

The following table was completed using data from the U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates, Table B02001 and B03002

Race and Hispanic or Latino Origin	#	%
Total Population	112313	100.0%
White alone	70539	62.8%
Black or African American alone	36637	32.6%
American Indian and Alaska Native alone	220	0.2%
Asian alone	437	0.4%
Native Hawaiian and Other Pacific Islander alone	103	0.1%
Some other race alone	2442	2.2%
Two or more races	1935	1.7%
Hispanic or Latino (of any race)	7154	6.4%
Hispanic or Latino: White alone	3976	3.5%
Hispanic or Latino: Black or African American alone	487	0.4%
Hispanic or Latino: American Indian and Alaska Native alone	0	0.0%
Hispanic or Latino: Asian alone	39	0.0%
Hispanic or Latino: Native Hawaiian and Other Pacific Islander alone	103	0.1%
Hispanic or Latino: Some other race alone	2139	1.9%
Hispanic or Latino: Two or more races	410	0.4%

Age and Sex

The following table was completed using data from the U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates, Table B01001

Sex by Age	Male		Female		Both Sexes	
	#	%	#	%	#	%
Total Population	53401	100.00%	58912	100.00%	112313	100.00%
Under 5 years	3056	5.72%	2870	4.87%	5926	5.28%
5 to 9 years	3290	6.16%	3415	5.80%	6705	5.97%
10 to 14 years	3511	6.57%	3924	6.66%	7435	6.62%
15 to 17 years	2213	4.14%	2477	4.20%	4690	4.18%
18 and 19 years	1068	2.00%	1348	2.29%	2416	2.15%
20 years	892	1.67%	683	1.16%	1575	1.40%
21 years	811	1.52%	931	1.58%	1742	1.55%
22 to 24 years	2035	3.81%	2194	3.72%	4229	3.77%
25 to 29 years	2868	5.37%	3044	5.17%	5912	5.26%
30 to 34 years	2906	5.44%	3003	5.10%	5909	5.26%
35 to 39 years	3033	5.68%	3130	5.31%	6163	5.49%
40 to 44 years	3077	5.76%	3474	5.90%	6551	5.83%
45 to 49 years	3245	6.08%	3505	5.95%	6750	6.01%
50 to 54 years	3702	6.93%	3943	6.69%	7645	6.81%
55 to 59 years	4265	7.99%	4346	7.38%	8611	7.67%
60 and 61 years	1378	2.58%	2085	3.54%	3463	3.08%
62 to 64 years	2351	4.40%	2276	3.86%	4627	4.12%
65 and 66 years	1679	3.14%	1612	2.74%	3291	2.93%
67 to 69 years	1971	3.69%	2563	4.35%	4534	4.04%
70 to 74 years	2443	4.57%	2988	5.07%	5431	4.84%
75 to 79 years	1908	3.57%	2033	3.45%	3941	3.51%
80 to 84 years	1056	1.98%	1496	2.54%	2552	2.27%
85 years and over	643	1.20%	1572	2.67%	2215	1.97%

Sex by Age	Male		Female		Both Sexes	
	#	%	#	%	#	%
Under 5 years	3056	5.72%	2870	4.87%	5926	5.28%
5 to 17 years	9014	16.88%	9816	16.66%	18830	16.77%
18 to 34 years	10580	19.81%	11203	19.02%	21783	19.39%
35 to 64 years	21051	39.42%	22759	38.63%	43810	39.01%
65 years and Over	9700	18.16%	12264	20.82%	21964	19.56%

Disability

The following table was completed using data from U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates, Table S1810

Disability characteristics	Total Individuals	With a disability	
		#	%
Total civilian noninstitutionalized population	124257	21073	17.0%
Population under 5 years	7034	25	0.4%
Population 5 to 17 years	20507	1077	5.3%
Population 18 to 34 years	25170	1929	7.7%
Population 35 to 64 years	49024	8949	18.3%
Population 65 years and over	22522	9093	40.4%
Sex			
Male	58538	10288	17.6%
Female	65719	10785	16.4%
Race			
White alone	79639	13287	16.7%
Black or African American alone	38218	7160	18.7%
American Indian and Alaska Native alone	338	41	12.1%
Asian alone	349	16	4.6%
Native American and Other Pacific Islander alone	143	46	32.2%
Some other race alone	3090	175	5.7%
Two of more races	2480	348	14.0%
Hispanic or Latino Origin			
Hispanic or Latino (of any race)	8053	502	6.2%

Poverty

The following table was completed using data from U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates, Table S1701

Poverty Status in the past 12 months	Total Estimate	Total Estimate Below poverty level	Percent below poverty level
Population for whom poverty status is determined	123423	23988	19.4%
AGE			
Under 18	26836	6488	5.3%
18 to 64	73705	14966	12.1%
65 years and over	22882	2534	2.1%
SEX			
Male	58566	9715	7.9%
Female	64857	14273	11.6%
RACE AND HISPANIC OR LATINO ORIGIN			
White	78727	10887	8.8%
Black or African American	38682	11148	9.0%
American Indian and Alaska Native	251	9	0.0%
Asian	669	34	0.0%
Native American and Other Pacific Islander	64	18	0.0%
Some other Race	2714	1351	1.1%
Two or more races	2316	541	0.4%
HISPANIC OR LATINO ORIGIN			
Hispanic or Latino (of any race)	7772	2567	2.1%

The following table was completed using data from U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates, Table C17002

Ratio of income to poverty level in the past 12 months	Individuals	Percentage
All individuals for whom poverty status is determined	111429	100.0%
below 50 percent of poverty level	8835	7.9%
50 to 99 percent of poverty level	13582	12.2%
100 to 124 percent of poverty level	7516	6.7%
125 to 149 percent of poverty level	7617	6.8%
150 to 184 percent of poverty level	8390	7.5%
185 to 199 percent of poverty level	2600	2.3%
200 percent or over of poverty level	62889	56.4%

Household Income

The following table was completed using data from U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates, Table B19001

Household income in the past 12 months (In 2017 inflation-adjusted dollars)	Households	
	#	%
Total Households	44177	100.0%
Less than \$10,000	4170	9.4%
\$10,000 to \$14,999	3477	7.9%
\$15,000 to \$19,999	3327	7.5%
\$20,000 to \$24,999	2979	6.7%
\$25,000 to \$29,999	2820	6.4%
\$30,000 to \$34,999	2525	5.7%
\$35,000 to \$39,999	2095	4.7%
\$40,000 to \$44,999	2375	5.4%
\$45,000 to \$49,999	1919	4.3%
\$50,000 to \$59,999	3460	7.8%
\$60,000 to \$74,999	4200	9.5%
\$75,000 to \$99,999	4954	11.2%
\$100,000 to \$124,999	2262	5.1%
\$125,000 to \$149,999	1358	3.1%
\$150,000 to \$199,999	1158	2.6%
\$200,000 or more	1098	2.5%

Methodology:

Geographic Identifiers of the Census Block Groups used for Race and Ethnicity, Sex and Age & Household Income tables:
371470016004, 371470015002, 371470010011, 371470011001, 371470020022, 371470009002, 371470012002, 371470012003, 371470020023, 371470016001, 371470009001, 371470019002, 371470019001, 371470018003, 371470020013, 371470017001, 371470019003, 371470020021, 371470014021, 371470018001, 371470018002, 371470018004, 371470018005, 371470020024, 371470011003, 371470009003, 371470020025, 371470015001, 371470014014, 370139302003, 370139305022, 370139305013, 370139304003, 370139308003, 370139305021, 370139308001, 370139310004, 370139303002, 370139304004, 370139301005, 370139303003, 370139305011, 371179703002, 371179704002, 371179705002, 371179705001, 371179702003, 371179706003, 371179703001, 371179702002, 371179704003, 371179704001, 371179705003, 371179703004, 371179702004, 371179702001, 371179703003, 371179701002, 371179706002, 370139306002, 370139310002, 370139301006, 370139304001, 370139309003, 370139307001, 370139310001, 370139301002, 370139301003, 370139301001, 370139308002, 370139309002, 370139306001, 370139302001, 370139310003, 370139304002, 371179701003, 371179705004, 371179701001, 371179706001, 370139301004, 370139309001, 370139307002, 370139303001, 370139302002, 370139305012
Geographic Identifiers of the Census Tracts used for Disability and Poverty tables:
37013930100, 37013930200, 37013930300, 37013930400, 37013930501, 37013930502, 37013930600, 37013930700, 37013930800, 37013930900, 37013931000, 37117970100, 37117970200, 37117970300, 37117970400, 37117970500, 37117970600, 37147000900, 37147001001, 37147001100, 37147001200, 37147001402, 37147001500, 37147001600, 37147001700, 37147001800, 37147001900, 37147002002

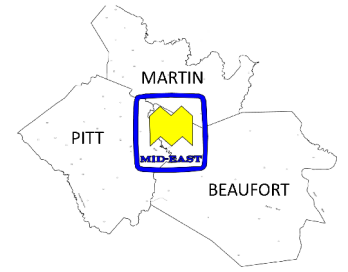
Appendix 5 - Demographic Maps (EJ)

The following demographic maps were developed using 2011-2015 American Community Survey Block Group data:

1. Race: Black or African American
2. Race: American Indian and Alaskan Native
3. Race: Asian
4. Race: Native Hawaiian & Pacific Islander
5. Race: Some Other Race
6. Race: Two or More Races
7. Poverty
8. Zero Car Households
9. Ethnicity: Hispanic & Latino
10. Limited English Proficiency: Spanish

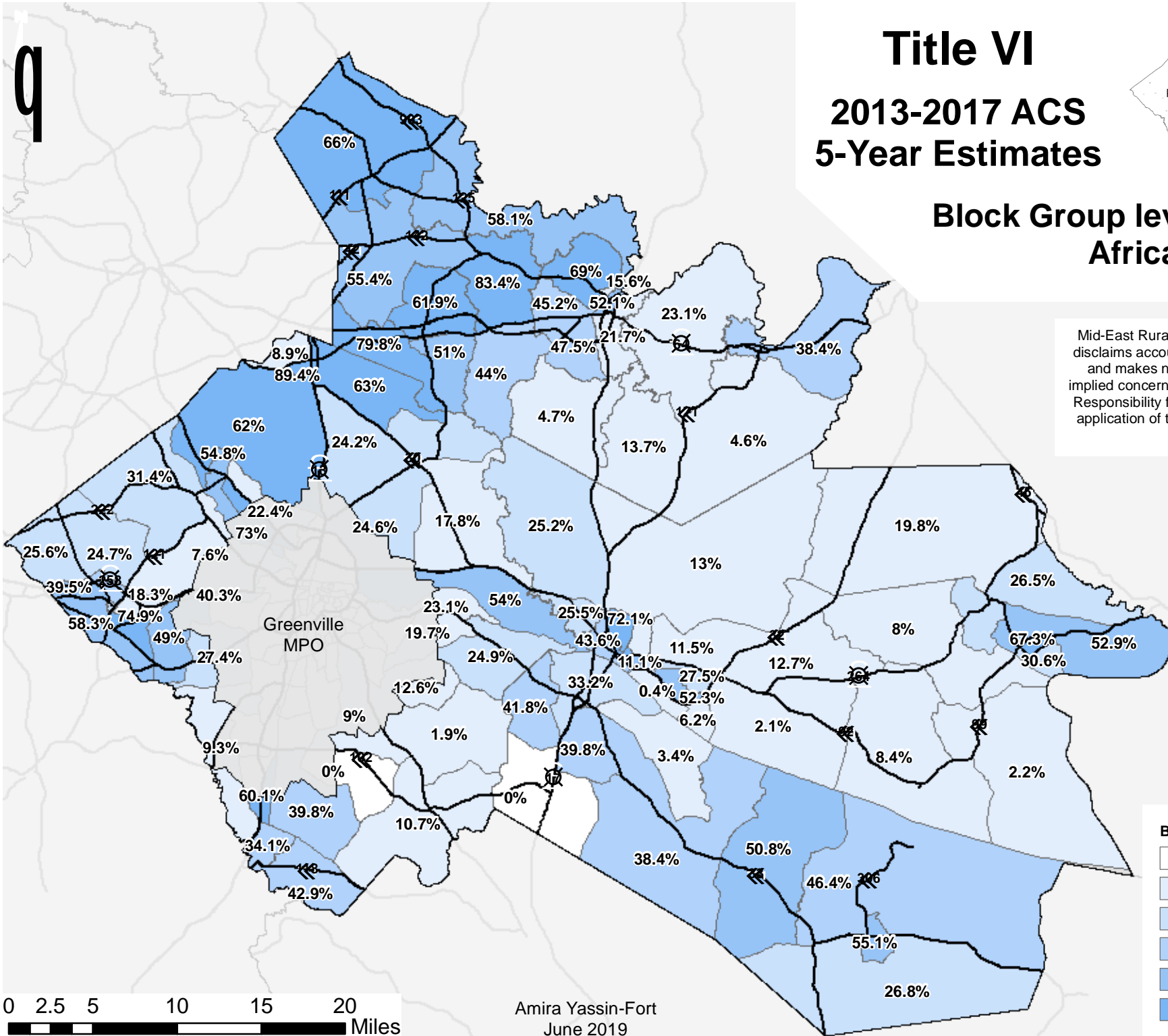
Title VI

2013-2017 ACS 5-Year Estimates



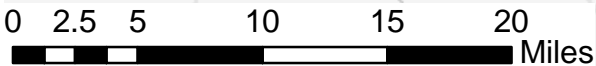
Block Group level: Black or African American

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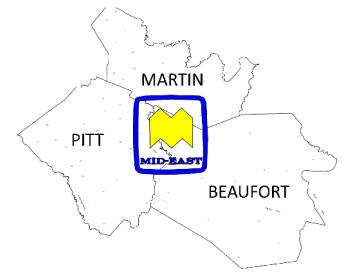
Black or African American

- 0.0%
- 0.1% - 23.1%
- 23.2% - 33.8%
- 33.9% - 47.5%
- 47.6% - 58.3%
- 58.4% - 90.9%



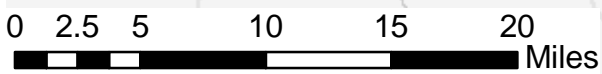
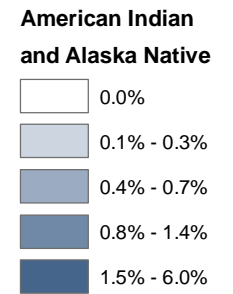
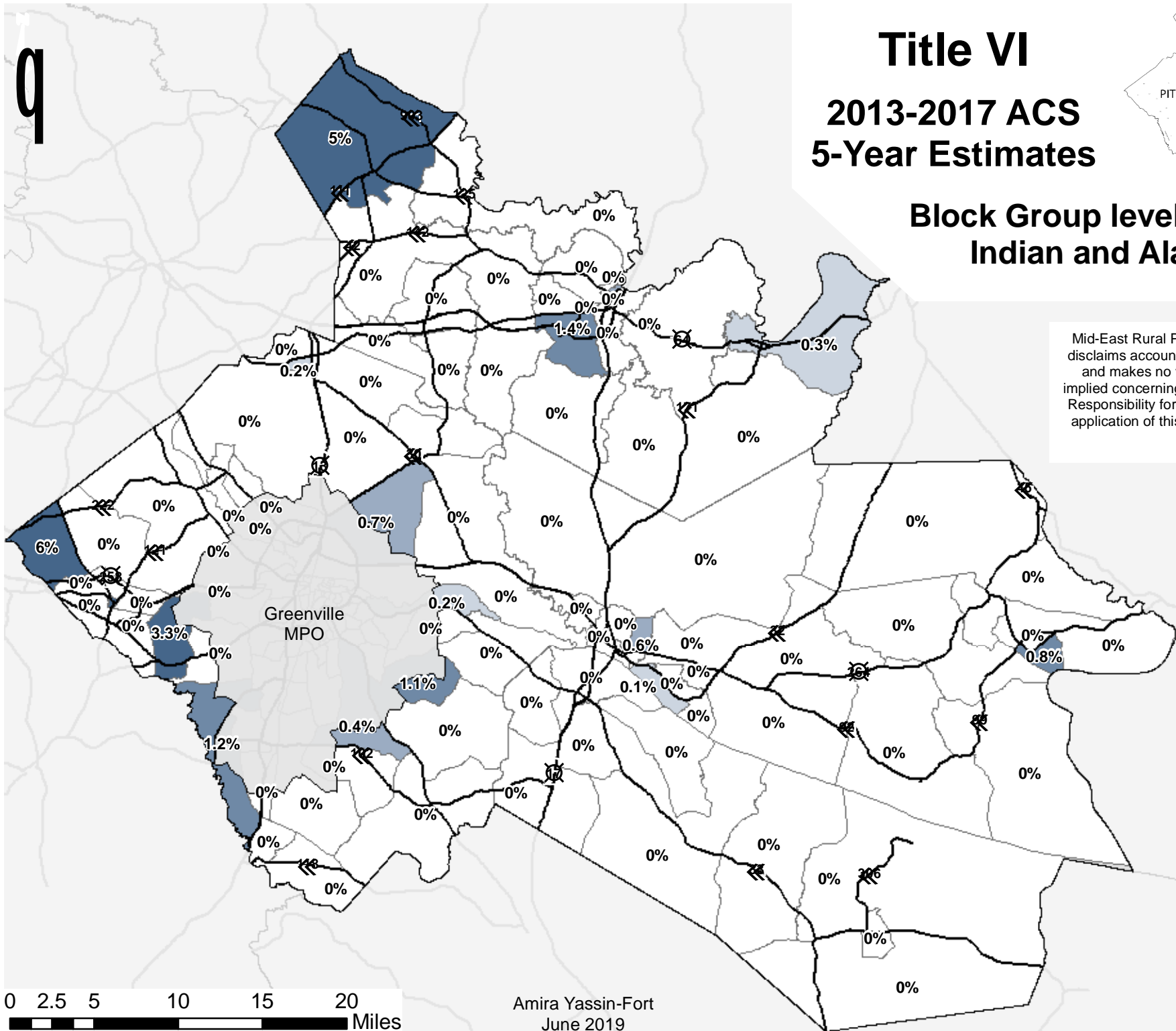
Title VI

2013-2017 ACS 5-Year Estimates



Block Group level: American Indian and Alaska Native

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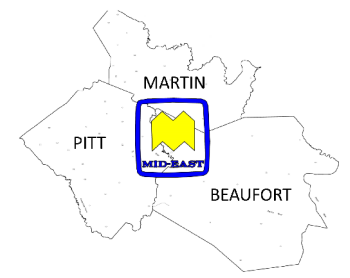


9

Title VI

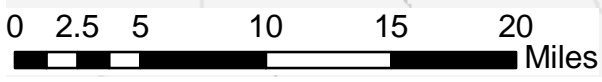
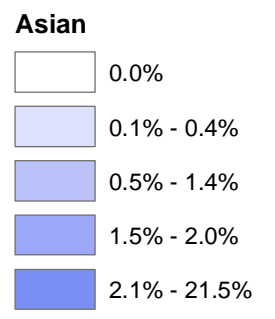
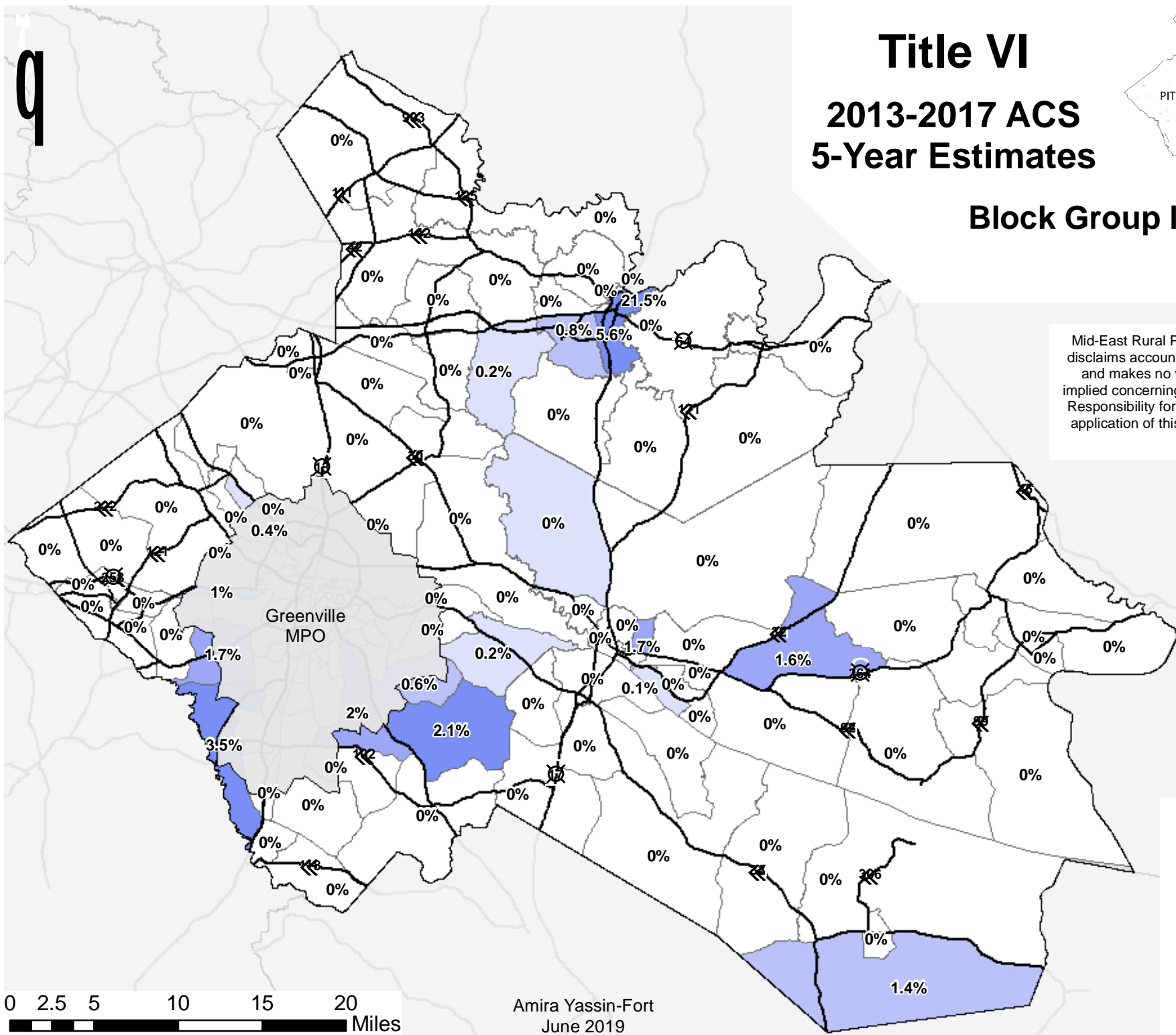
2013-2017 ACS

5-Year Estimates



Block Group level: Asian

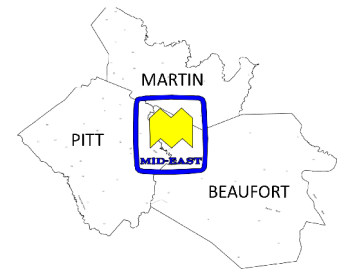
Mid-East Rural Planning Organization disclaims accountability for this product and makes no warranty express or implied concerning the accuracy thereof. Responsibility for the interpretation and application of this product lies with the user.



Amira Yassin-Fort
June 2019

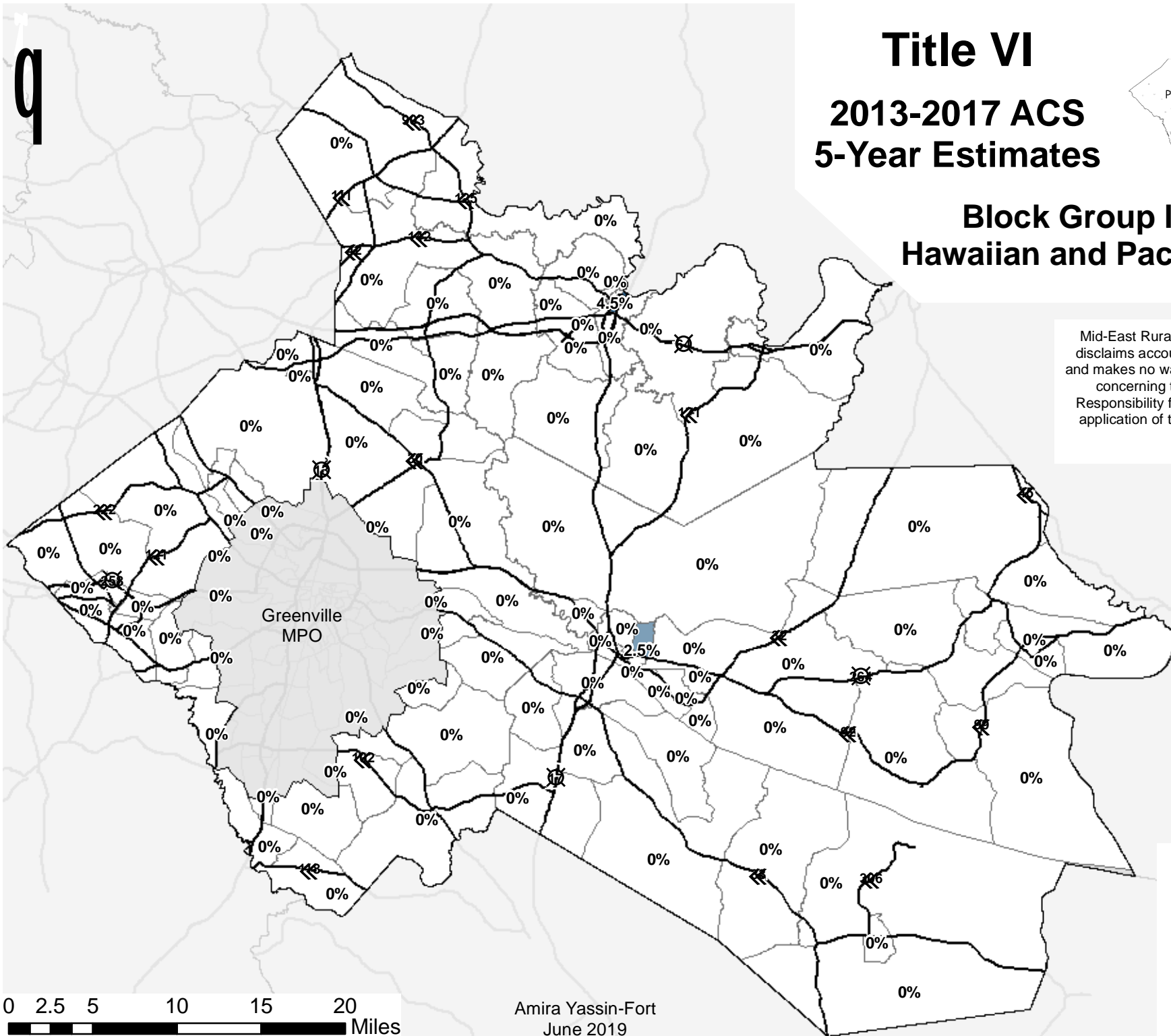
Title VI

2013-2017 ACS 5-Year Estimates



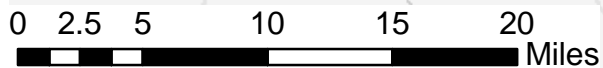
Block Group level: Native Hawaiian and Pacific Islander

Mid-East Rural Planning Organization
disclaims accountability for this product
and makes no warranty express or implied
concerning the accuracy thereof.
Responsibility for the interpretation and
application of this product lies with the
user.

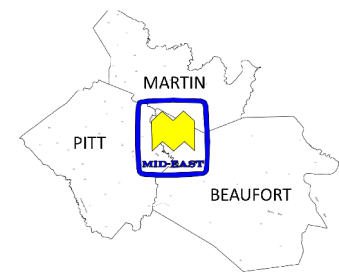


Native Hawaiian and Pacific Islander

- 0.0%
- 0.1% - 2.5%
- 2.6% - 4.5%

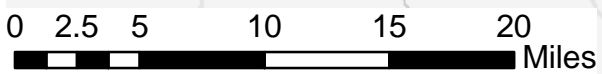
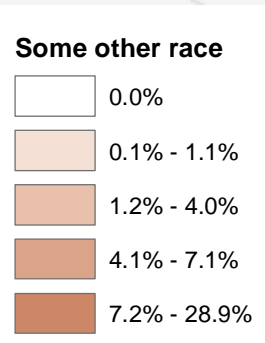
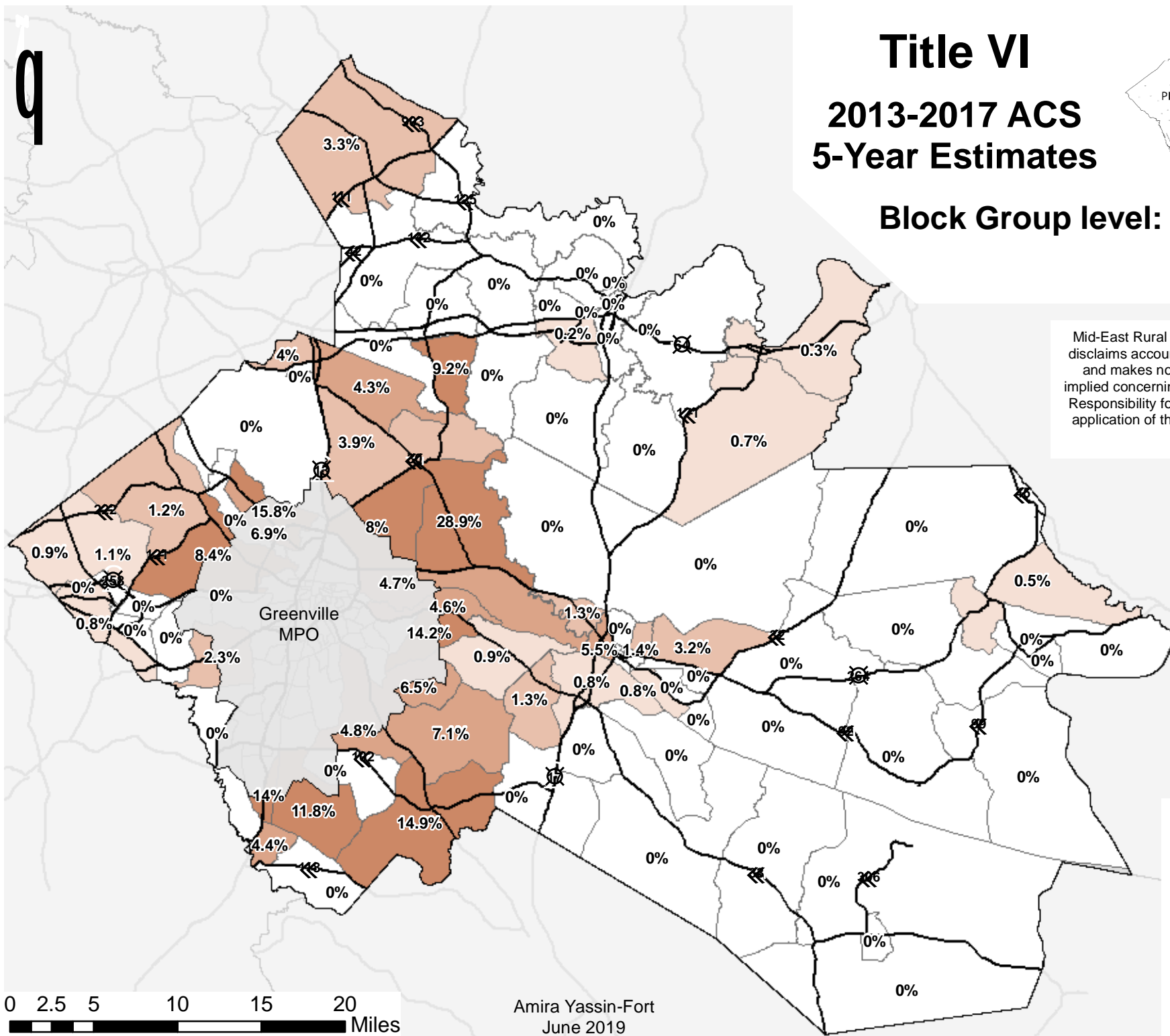


Title VI 2013-2017 ACS 5-Year Estimates



Block Group level: Some other race

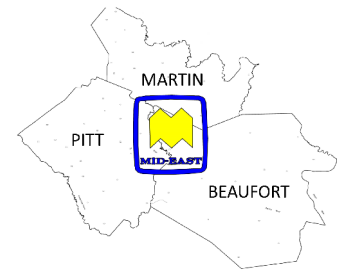
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Title VI

2013-2017 ACS

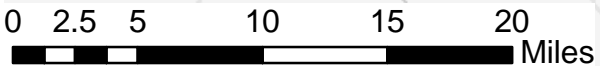
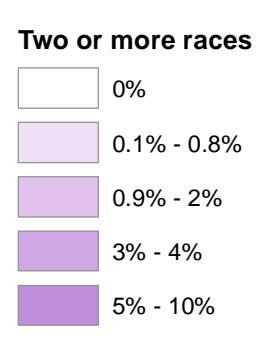
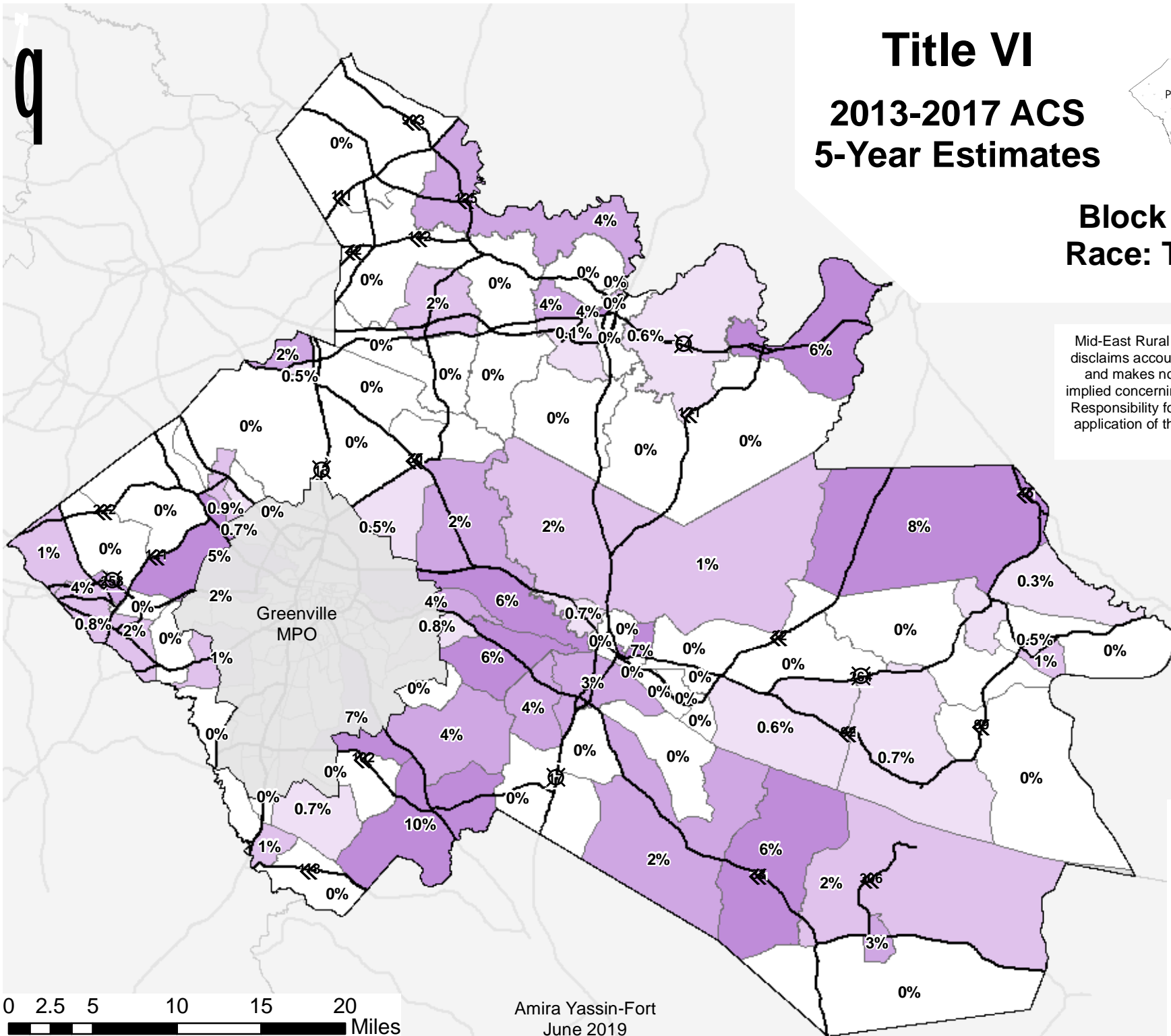
5-Year Estimates



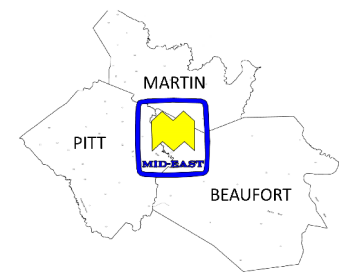
Block Group level

Race: Two or more

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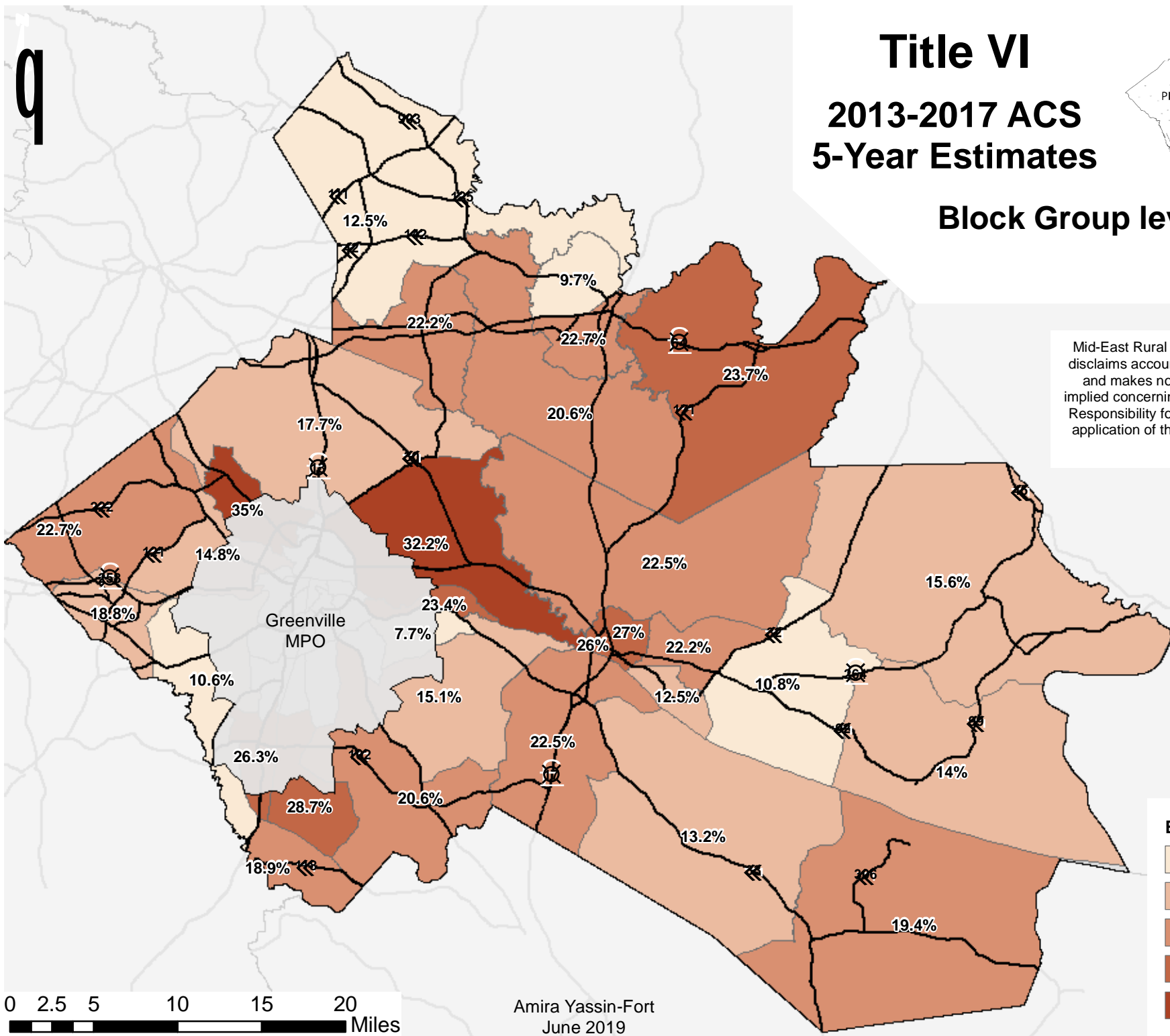


Title VI 2013-2017 ACS 5-Year Estimates



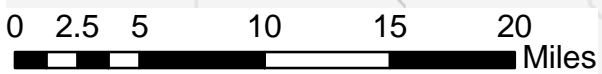
Block Group level: Poverty

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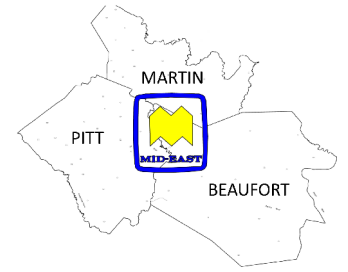
Below Poverty Level

4.5% - 12.5%
12.6% - 18.8%
18.9% - 22.7%
22.8% - 30.1%
30.2% - 66.4%



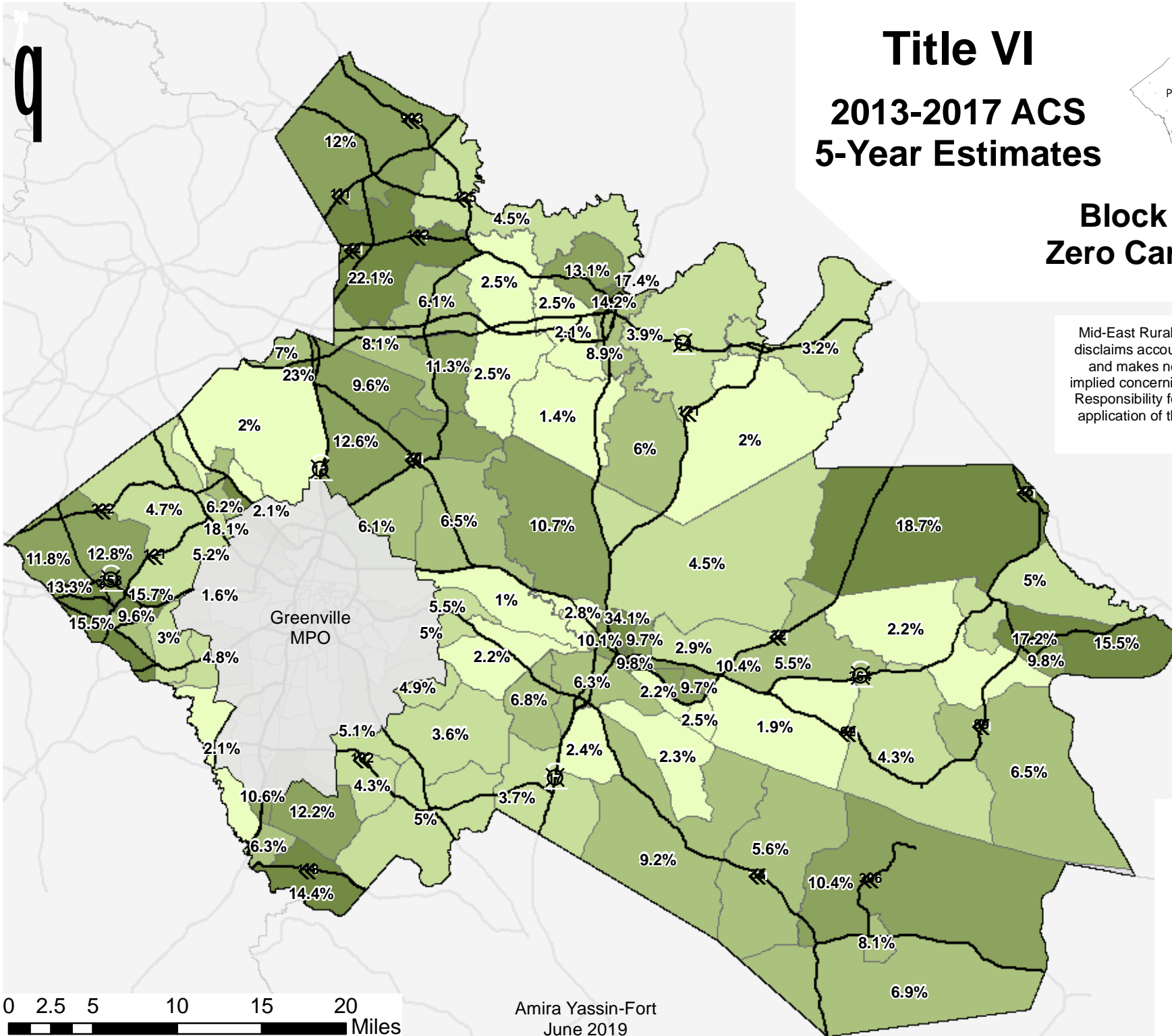
Title VI

2013-2017 ACS 5-Year Estimates

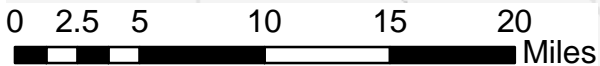
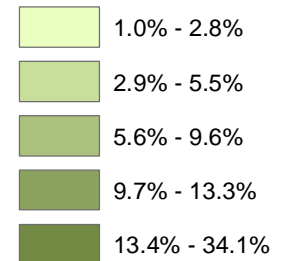


Block Group level Zero Car Household

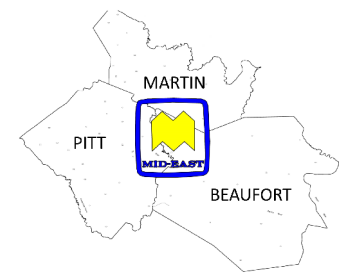
Mid-East Rural Planning Organization disclaims accountability for this product and makes no warranty express or implied concerning the accuracy thereof. Responsibility for the interpretation and application of this product lies with the user.



Zero Car Household

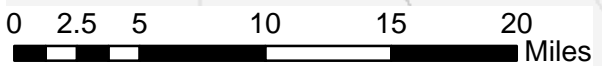
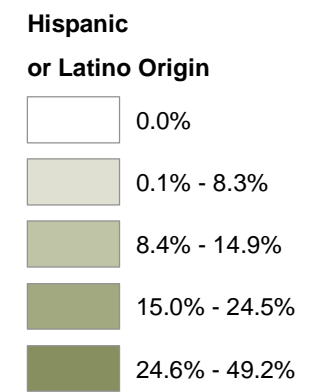
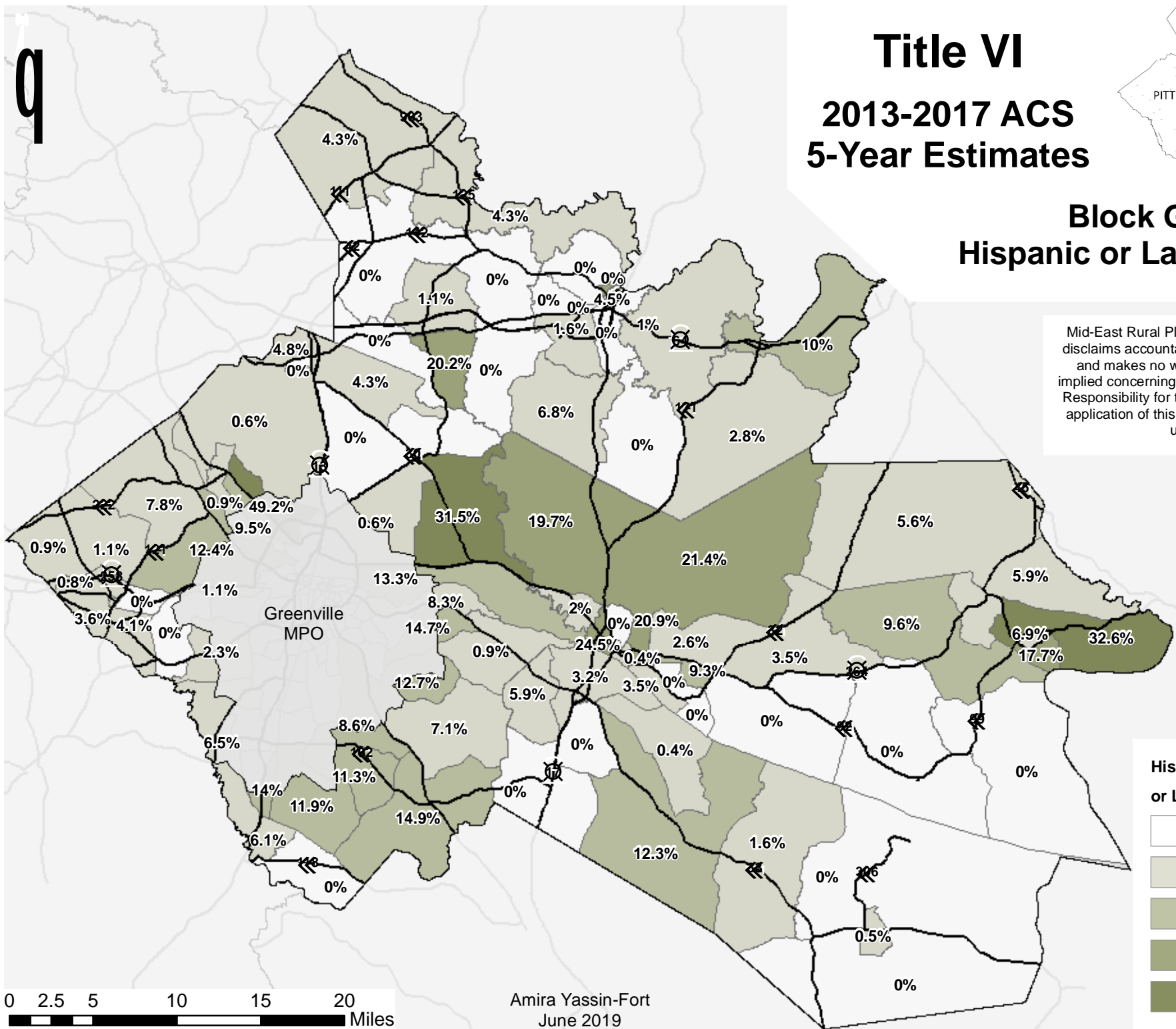


Title VI 2013-2017 ACS 5-Year Estimates

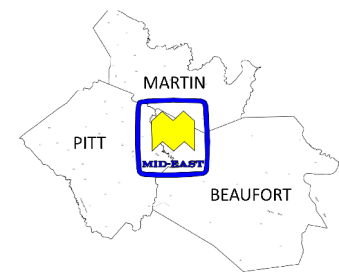


Block Group level Hispanic or Latino Origin

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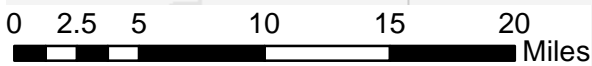
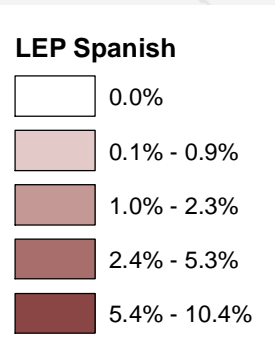
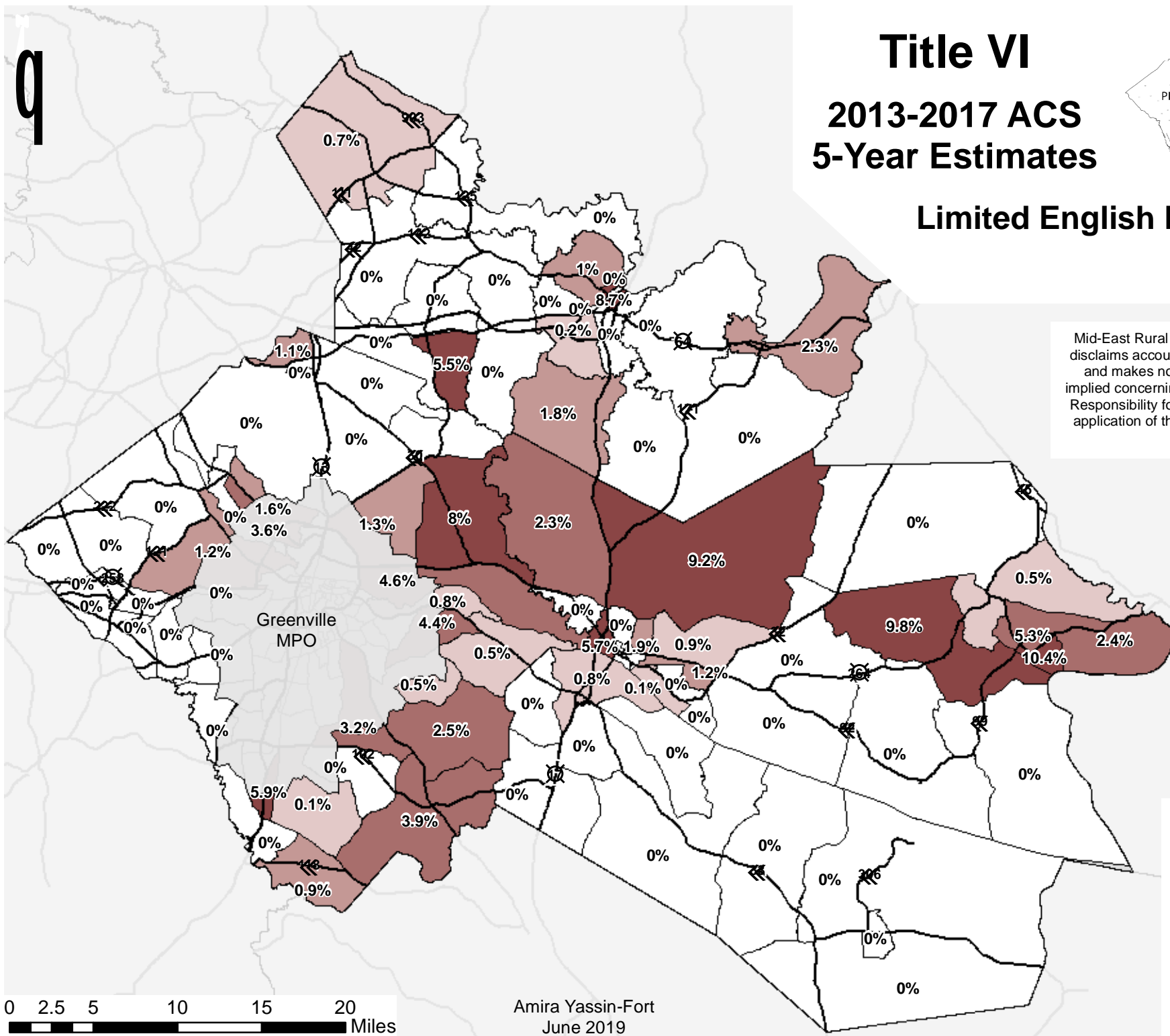


Title VI 2013-2017 ACS 5-Year Estimates



Limited English Proficiency: Spanish

Mid-East Rural Planning Organization disclaims accountability for this product and makes no warranty express or implied concerning the accuracy thereof. Responsibility for the interpretation and application of this product lies with the user.



Appendix 6 - Discrimination Complaint Form and Log

INVESTIGATIVE GUIDANCE

- A. Scope of Investigation** – An investigation should be confined to the issues and facts relevant to the allegations in the complaint, unless evidence shows the need to extend the issues.
- B. Developing an Investigative Plan** – It is recommended that the investigator (i.e., Title VI Coordinator or other official trained to conduct Title VI investigations) prepares an Investigative Plan (IP) to define the issues and lay out the blueprint to complete the investigation. The IP should follow the outline below:
1. Complainant(s) Name and Address (Attorney name and address if applicable)
 2. Respondent(s) Name and Address (Attorney for the Respondent(s) name and address, if applicable)
 3. Applicable Law(s)
 4. Basis/(es)
 5. Allegation(s)/Issue(s)
 6. Background
 7. Name of Persons to be interviewed
 - a. Questions for the complainant(s)
 - b. Questions for the respondent(s)
 - c. Questions for witness(es)
 8. Evidence to be obtained during the investigation
 - a. Issue – e.g., Complainant alleges his predominantly African American community was excluded from a meeting concerning a future project which could affect the community.
 - i. Documents needed – e.g., mailing list which shows all physical addresses, P.O. Box numbers, property owner names, and dates when the meeting notification was mailed; other methods used to advertise the meeting.
- C. Request for Information** – The investigator should gather data and information pertinent to the issues raised in the complaint.
- D. Interviews** – Interviews should be conducted with the complainant, respondent, and appropriate witnesses during the investigative process. Interviews are conducted to gain a better understanding of the situation outlined in the complaint of discrimination. The main objective during the interview is to obtain information that will either support or refute the allegations.
- E. Preparing an Investigative Report** – The investigator should prepare an investigative report setting forth all relevant facts obtained during the investigation. The report should include a finding for each allegation. A sample outline for an investigative report is provided below.

Sample Investigative Report Template

I. COMPLAINANT(S) NAME (or attorney for the complainant(s) – name and address if applicable)
Name, Address, Phone Number

II. RESPONDENT(S) (or attorney for the respondent(s) – name and address if applicable)
Name, Address, Phone Number

III. APPLICABLE LAW/REGULATION

For example, Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d); 49 CFR §21.11; 49 CFR §26.53)

IV. COMPLAINT BASIS/(ES)

For example, Race, Color, National Origin, Limited English Proficiency, Sex, Age, Disability

V. ALLEGATIONS

Describe in logical sequence, each allegation including the prohibited basis for the alleged discriminatory conduct, (e.g., race, color, national origin, sex, age, or disability) and the specific statutory or regulatory provision the allegation would violate, if proven to be true.

VI. BACKGROUND

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

VII. INVESTIGATIVE PROCEDURE

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

VIII. FINDINGS OF FACT

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

IX. CONCLUSION

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

X. RECOMMENDED ACTIONS

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

XI. SUPPLEMENTAL MATERIALS

Include in any supplemental materials that support your findings and conclusion.

Mid-East Rural Transportation Planning Organization
 DISCRIMINATION COMPLAINT FORM

<p>Any person who believes that he/she has been subjected to discrimination based upon race, color, national origin, sex, age, or disability may file a written complaint with Mid-East RPO, within 180 days after the discrimination occurred.</p>				
Last Name:		First Name:		<input type="checkbox"/> Male <input type="checkbox"/> Female
Mailing Address:		City	State	Zip
Home Telephone:	Work Telephone:	E-mail Address		
Identify the Category of Discrimination: <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> AGE <input type="checkbox"/> SEX <input type="checkbox"/> DISABILITY <input type="checkbox"/> LIMITED ENGLISH PROFICIENCY				
Identify the Race of the Complainant <input type="checkbox"/> Black <input type="checkbox"/> White <input type="checkbox"/> Hispanic <input type="checkbox"/> Asian American <input type="checkbox"/> American Indian <input type="checkbox"/> Alaskan Native <input type="checkbox"/> Pacific Islander <input type="checkbox"/> Other _____				
Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.				
Names of individuals responsible for the discriminatory action(s):				
How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional page(s), if necessary).				
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 Highway Administration _____
- US Department of Transportation _____
- Federal or State Court _____
- Other _____

Have you discussed the complaint with any Mid-East RPO 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:
Mid-East RPO
1502 N Market Street, Suite A
Washington, NC 27889
252-946-8043

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: NCDOT FHWA Date Referred: _____

DISCRIMINATION COMPLAINTS LOG

Log Year(s):

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

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 **Mid-East Rural Transportation Planning Organization** 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

Appendix 7 - 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:	Date:
Location:	

In accordance with Title VI of the Civil Rights Act of 1964 and related authorities, the Mid-East Rural Transportation Planning Organization (MERPO) 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, hand it to a MERPO official or mail it to the Mid-East Rural Transportation Planning Organization, 1480 Harbour Dr, Wilmington, NC 28401. All forms will remain on file at the MERPO as part of the public record.

Zip Code: _____	Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female
Street Name: i.e. Main Street) _____	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 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 Other (please specify): _____

Thank you for your participation!

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.

Tipo de Reunión: _____	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, la política de la Organización de Planificación del Transporte Rural de Mid-East (MERPO por sus siglas en inglés) 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. **Completando este formato nos ayudará a cumplir con nuestra recopilación de datos y a cumplir con las obligaciones de participación pública bajo el Título VI y NEPA, y así mejorar nuestro servicio al público.** Por favor deposite el formato llenado en la casilla designada en la mesa de registro o envíelo por correo a MERPO, 1502 N Market St., Suite A, Washington, NC 27889.

Los formatos completados serán guardados en los archivos de NCDOT como parte del registro público.

Código Postal: _____	Sexo: <input type="checkbox"/> Masculino <input type="checkbox"/> Femenino
Nombre de la Calle: (ej. Main Street)	Edad: <input type="checkbox"/> Menor de 18 <input type="checkbox"/> 45-64 <input type="checkbox"/> 18-29 <input type="checkbox"/> 65 and older <input type="checkbox"/> 30-44
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	Discapacidad: <input type="checkbox"/> Si <input type="checkbox"/> No
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/Islands 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 Otro (por favor especifique): _____

¿Cómo se enteró de esta reunión? (anuncio en el periódico, folleto, y/o correo) _____

Para más información relacionada con el Título VI o este proceso, por favor contacte a MERPO Sección Título VI al teléfono (252) 974-1857 o por correo electrónico edejesus@mideastcom.org ; Gracias por su cooperación!

Appendix 8 - Compliance Review Checklist for FHWA Subrecipients

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