



PIEDMONT TRIAD
RURAL PLANNING ORGANIZATION

Title VI Program Plan

DRAFT

February 2019

Table of Contents

Title VI Policy Statement and Notice of Nondiscrimination	3
Standard USDOT Title VI Assurances	3
Organization & Staffing	4
Title VI Coordinator	4
Staffing	5
Environmental Justice (EJ)	5
Data Collection/Analysis/Reporting.....	6
Population Locations	6
Limited English Proficiency (LEP)	6
Four Factor Analysis.....	6
Language Assistance Plan.....	9
Language Assistance Measures	9
Written Translation and Oral Interpretation	9
Staff Support for Language Assistance	10
Project-Specific LEP Outreach.....	10
Monitoring and Updating the Language Assistance Plan	10
Dissemination of Title VI Information.....	10
Public Involvement	11
Public Notification.....	11
Dissemination of Information	11
Meetings and Outreach	12
Public Relations and Outreach.....	12
Public Meetings	12
Small Group Meetings.....	12
Community Surveying	13
External Discrimination Complaint Procedures.....	14
Filing of Complaints	14
Complaint Processing	15
Complaint Log.....	15
Review of Organizational Directives.....	16
Title VI Training	16
Compliance and Enforcement Procedures	16
Appendix A: Title VI Assurances.....	18
Appendix B: TAC & TCC Members and Responsibilities	26
Appendix C: Organizational Chart	27

Appendix D: Demographic Tables.....	28
Race and Ethnicity.....	28
Age and Sex.....	30
Disability.....	31
Poverty.....	35
Household Income.....	39
Appendix E: Demographic Maps (EJ).....	42
Appendix F: Investigation Guidance, Discrimination Complaint Form & Log.....	48
Investigative Guidance.....	48
Sample Investigative Report Template.....	49
Discrimination Complaints Log.....	52
Appendix G: Compliance Review Checklist for FHWA Subrecipients.....	53
Appendix H: 2009-2013 American Community Survey 5-Year Estimates.....	54

Title VI Policy Statement and Notice of Nondiscrimination

It is the policy of the Piedmont Triad Rural Planning Organization (PTRPO), 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.

Kelly Larkins, Piedmont Triad RPO Title VI Coordinator
1398 Carrollton Crossing Drive
Kernersville, NC 27284
336-904-0300
ptrpo@ptrc.org

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

Signature

Matthew Dolge, Executive Director

Date

Implementation (Dissemination)

- This Policy Statement contains contact information for the Title Coordinator, and it will also serve as our notice to public.
- This statement will be signed by the Executive Director of the Piedmont Triad Regional Council, 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 A 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 Federal Highway Administration (FHWA) State Planning and Research (SPR) funds from NCDOT's Transportation Planning Division (TPD).

The Piedmont Triad RPO was established in 2002. Our planning area includes the following counties: Caswell, Montgomery, Randolph, and Rockingham. Our Transportation Advisory Committee (TAC) has eight (8) members, and meets six times a year – every other month – in February, April, June, August, October, and December. Our Technical Coordinating Committee (TCC) can have approximately 31 members, and meets during the same time as the TAC. Please refer to **Appendix B** for lists of current TAC and TCC members.

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 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 four (4), which consists of the following job categories:

- Executive Director
- RPO Coordinator
- Planning Department Director
- Regional Planner

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

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 Piedmont Triad Rural Planning Organization will make achieving EJ part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income populations.

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

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

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

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

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

Limited English Proficiency (LEP)

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

To comply with USDOT's LEP Policy Guidance and Executive Order 13166, this section of our Title VI Plan outlines the steps the Piedmont Triad Rural Planning Organization (Piedmont Triad RPO or PTRPO) 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>

The PTRPO evaluated non-English speakers in the counties that make up the RPO: Caswell, Montgomery, Randolph, and Rockingham. It has been determined that there are Eligible Populations in Spanish speaking populations in Montgomery and Randolph County.

Caswell County				
LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
Total:	22,308	55	100.0%	0.2%
Speak only English	21,600	136	96.8%	0.6%
Spanish or Spanish Creole:	635	138	2.8%	0.6%
Speak English "very well"	330	125	1.5%	0.6%
Speak English less than "very well"	305	96	1.4%	0.4%
French (incl. Patois, Cajun):	14	16	0.1%	0.1%
Speak English "very well"	14	16	0.1%	0.1%
Chinese:	22	34	0.1%	0.2%
Speak English less than "very well"	22	34	0.1%	0.2%

Montgomery County				
LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
Total:	26,020	10	100.0%	0.0%
Speak only English	21,863	223	84.0%	0.9%
Spanish or Spanish Creole:	3,606	204	13.9%	0.8%
Speak English "very well"	1,759	284	6.8%	1.1%
Speak English less than "very well"	1,847	209	7.1%	0.8%

Randolph County				
LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
Total:	133,213	40	100.0%	0.0%
Speak only English	119,093	605	89.4%	0.5%
Spanish or Spanish Creole:	12,130	546	9.1%	0.4%
Speak English "very well"	6,248	568	4.7%	0.4%
Speak English less than "very well"	5,882	563	4.4%	0.4%

Rockingham County				
	Estimate	Margin of Error	Percent of Population	Margin of Error
Total:	87,972	53	100.00%	0.1%
Speak only English	82,934	351	94.3%	0.4%
Spanish or Spanish Creole:	4,346	307	4.9%	0.3%
Speak English "very well"	2,286	325	2.6%	0.4%
Speak English less than "very well"	2,060	283	2.3%	0.3%
German:	164	113	0.2%	0.1%
Speak English "very well"	120	75	0.1%	0.1%
Speak English less than "very well"	44	60	0.1%	0.1%
Other West Germanic languages:	32	34	0.0%	0.0%
Speak English "very well"	32	34	0.0%	0.0%
Chinese:	66	72	0.1%	0.1%
Speak English "very well"	26	29	0.0%	0.0%
Speak English less than "very well"	40	49	0.0%	0.1%

LEP populations in Randolph County are geographically located primarily in three areas: between Asheboro and Randleman, south of Asheboro, and west of Ramseur. In Montgomery County, LEP populations are primarily located in the eastern half of the county around the municipalities of Biscoe and Candor.

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

All contacts with the Piedmont Triad RPO are made through its office in Kernersville or at public outreach meetings that support a specific project. These contacts are potentially made through telephone calls, mail, the RPO's webpage, e-mail, and in person. LEP populations have traditionally not participated in public outreach events of the RPO, but creates and opportunity for further improvement.

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

The Piedmont Triad RPO is a partnership between local and state government that makes decisions about transportation planning in rural areas and meets planning requirements established by federal authorizing legislation for transportation funding. While our programs serve a necessary and meaningful public purpose, they do not rise to the level of matters having life or death implications (e.g., the provision of services to children, medical care, food, housing, etc.).

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

The Piedmont Triad RPO along with the Piedmont Triad Regional Council (PTRC) is committed to finding translation resources for LEP populations if requested. Costs related to these services vary according to the type, length, and speed of the services being provided. Cost, speed, and reliability will a few of the factors used in determining which external businesses or organizations are chosen to assist the Piedmont Triad RPO.

Language Assistance Plan

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

Language Assistance Measures

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

- Translating public notices posted in the local paper and at stations, stops, and in vehicles into **any languages that meet the safe harbor threshold in Factor 1**.
- Vital documents—such as brochures with service times and routes—are translated into Spanish across the entire service area, and available in our facilities, doctor's offices and shopping centers.
- Making a concerted effort to inform LEP persons of available language assistance via staff, broadcast media, relationship-building with organizations, and our website.
- Posting vital bulletin board information and disseminating community surveys in various languages.
- Providing translation and interpretive services when appropriate (upon request or predetermined) at meetings.
- Determining how best to take public involvement to LEP groups directly, including through small group meetings.
- 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.

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 contracted to provide LEP services. This list will be updated as needed to remain current.
- All main offices will have available language assistance flashcards and materials translated into the languages that meet the safe harbor threshold. When encountering an LEP person, staff should present the individual with an iSpeak flashcard and let them choose the language. Do not assume their preferred language. Assistance may be sought from bilingual staff fluent in the identified language before contacting a referral resource. Document the encounter and report it to the Title VI Coordinator.
- **Training:** All employees will be instructed on our procedures for providing timely and reasonable assistance to LEP persons. New employee orientation will also explain these procedures to new hires. Staff routinely encountering LEP persons by telephone or in person will receive annual refresher training. All other employees will be reminded of LEP through annual Title VI program 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 Piedmont Triad Rural Planning Organization will utilize community outreach and public education to disseminate Title VI information to our employees, contractors, sub-recipients and the general public. Reasonable steps will be taken to make the public aware of their rights and our obligations under Title VI through, including, but not limited to:

- Visibly posting our Title VI Policy Statement in public areas at our facilities, on our website, at our meetings, and prominently in any documents and reports we distribute;
- Placing notices in newspapers and publications with a large circulation among minority groups in the general vicinity of projects and activities. Ads in newspapers and other publications shall include the following:
“Piedmont Triad Rural Planning Organization (PTRPO) 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 336-904-0300; ptrpo@ptrc.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 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: <http://www.ptrc.org/ptrpo>.

Public Involvement

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

General public involvement practices will include:

- Expanding traditional outreach methods such as informal community gatherings.
- Providing for early, frequent and continuous engagement by the public.
- Use of social media and other resources as a way to gain public involvement.
- Coordinating with community- and faith-based organizations such as the Hispanic Liaison, educational institutions, and other entities to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
- Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations.

Public Notification

We will inform people of their rights under Title VI and related authorities with regard to our program. The primary means of achieving this will be posting and disseminating the policy statement and notice. Additional measures may include verbally announcing our obligations and the public's rights at meetings, placing flyers at places frequented by targeted populations, and an equal opportunity tag-on at the end of radio announcements. The method of notification will be determined through an initial screening of the area.

Dissemination of Information

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

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

Meetings and Outreach

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

Public Relations and Outreach

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

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

Public Meetings

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

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

Small Group Meetings

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

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

Community Surveying

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

External Discrimination Complaint Procedures

These discrimination complaint procedures outline the process used by Piedmont Triad Rural Planning Organization (PTRPO) 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 PTRPO 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:

- **Piedmont Triad Rural Planning Organization**, 1398 Carrollton Crossing Drive, Kernersville, NC 27284; 336-904-0300
 - **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. (Executive Order 13166)
Color	Color of skin, including shade of skin within a racial group	Black, White, brown, yellow, etc.	
National Origin (LEP)	Place of birth. Citizenship is not a factor. Discrimination based on language or a person's accent is also covered.	Mexican, Cuban, Japanese, Vietnamese, Chinese	
Sex	Gender	Women and Men	1973 Federal-Aid Highway Act; Title IX of the Education Amendments of 1972.
Age	Persons of any age	21-year-old person	Age Discrimination Act of 1975
Disability	Physical or mental impairment, permanent or temporary, or perceived.	Blind, alcoholic, para-amputee, epileptic, diabetic, arthritic	Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990

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 F** 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 90 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 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 Piedmont Triad 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, the Piedmont Triad RPO 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, Piedmont Triad RPO 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 the Piedmont Triad RPO 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 A: Title VI Assurances



PIEDMONT TRIAD RURAL PLANNING ORGANIZATION

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

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

Statutory/Regulatory Authorities

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

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

General Assurances

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

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

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

Specific Assurances

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

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

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

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


"The Piedmont Triad Rural Planning Organization, 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.

By signing this ASSURANCE, the *Piedmont Triad 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 *Piedmont Triad 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 *State of North Carolina*, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the **Federal-Aid Highway Program**. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Piedmont Triad Regional Council

by 
Matthew Dolge, Executive Director

DATED 5/22/18

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 *Piedmont Triad Rural Planning Organization (PTRPO)* 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 *PTRPO* 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 *Piedmont Triad Rural Planning Organization (PTRPO)* 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 *PTRPO*, its successors and assigns.

The *PTRPO*, 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 *PTRPO* 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 into by the *Piedmont Triad Rural Planning Organization (PTRPO)* 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 *PTRPO* 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 *PTRPO* 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 *PTRPO* and its assigns.*

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

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

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the *Piedmont Triad Rural Planning Organization (PTRPO)* 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 *PTRPO* 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 *PTRPO* will there upon revert to and vest in and become the absolute property of the *PTRPO* 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:

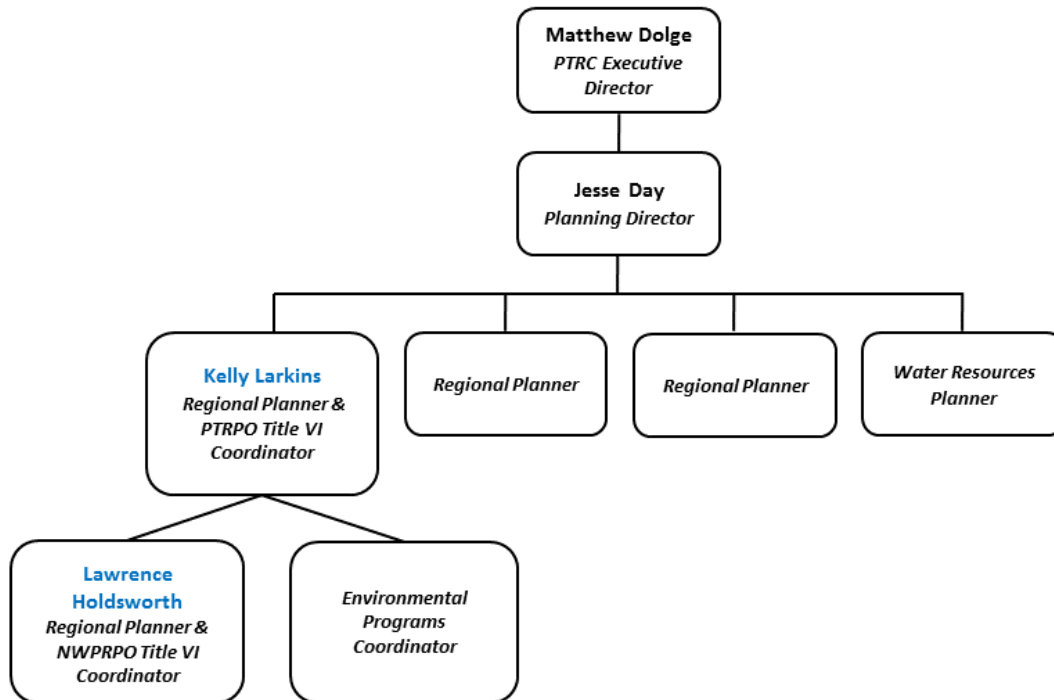
Pertinent Nondiscrimination Authorities:

- 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 B: TAC & TCC Members and Responsibilities

An up-to-date list of TAC and TCC members and responsibilities are available by visiting <http://www.ptrc.org/ptrpo>.

Appendix C: Organizational Chart



Appendix D: Demographic Tables

Race and Ethnicity

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

Caswell County		
Race and Ethnicity	Number	Percent
Total population	23,719	100
One race	23,338	98.4
White	14,819	62.5
Black or African American	8,020	33.8
American Indian and Alaska Native	85	0.4
Asian	60	0.3
Native Hawaiian and Other Pacific Islander	4	0
Some Other Race	350	1.5
HISPANIC OR LATINO		
Total population	23,719	100
Hispanic or Latino (of any race)	744	3.1
Mexican	607	2.6
Puerto Rican	42	0.2
Cuban	17	0.1
Other Hispanic or Latino	78	0.3

Montgomery County		
Race and Ethnicity	Number	Percent
Total population	27,798	100
One race	27,396	98.6
White	19,162	68.9
Black or African American	5,231	18.8
American Indian and Alaska Native	120	0.4
Asian	441	1.6
Native Hawaiian and Other Pacific Islander	3	0
Some Other Race	2439	8.8
HISPANIC OR LATINO		
Total population	27,798	100
Hispanic or Latino (of any race)	3926	14.1
Mexican	3634	13.1
Puerto Rican	36	0.1
Cuban	29	0.1
Other Hispanic or Latino	227	0.8

Randolph County		
Race and Ethnicity	Number	Percent
Total population	141,752	100
One race	139,322	98.3
White	121,169	85.5
Black or African American	8,176	5.8
American Indian and Alaska Native	952	0.7
Asian	1431	1
Native Hawaiian and Other Pacific Islander	33	0
Some Other Race	7561	5.3
HISPANIC OR LATINO		
Total population	141,752	100
Hispanic or Latino (of any race)	14698	10.4
Mexican	11960	8.4
Puerto Rican	383	0.3
Cuban	194	0.1
Other Hispanic or Latino	2161	1.5

Rockingham County		
Race and Ethnicity	Number	Percent
Total population	93,643	100
One race	91,973	98.2
White	70,875	75.7
Black or African American	17,655	18.9
American Indian and Alaska Native	345	0.4
Asian	430	0.5
Native Hawaiian and Other Pacific Islander	60	0.1
Some Other Race	2608	2.8
HISPANIC OR LATINO		
Total population	93,643	100
Hispanic or Latino (of any race)	5159	5.5
Mexican	4216	4.5
Puerto Rican	200	0.2
Cuban	51	0.1
Other Hispanic or Latino	692	0.7

Age and Sex

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

Caswell County							
Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
Total population	23,719	12,074	11,645	100	100	100	103.7
Under 5 years	1,181	602	579	5	5	5	104
Under 18 years	4,889	2,537	2,352	20.6	21	20.2	107.9
18 to 64 years	15,075	7,935	7,140	63.6	65.7	61.3	111.1
65 years and over	3,755	1,602	2,153	15.8	13.3	18.5	74.4
Median age (years)	43.6	41.7	45.7	(X)	(X)	(X)	(X)

Montgomery County							
Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
Total population	27,798	13,458	14,340	100	100	100	93.8
Under 5 years	1,729	864	865	6.2	6.4	6	99.9
Under 18 years	6,746	3,402	3,344	24.3	25.3	23.3	101.7
18 to 64 years	16,688	8,169	8,519	60	60.7	59.4	95.9
65 years and over	4,364	1,887	2,477	15.7	14	17.3	76.2
Median age (years)	40.2	39.1	41.2	(X)	(X)	(X)	(X)

Randolph County							
Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
Total population	141,752	69,838	71,914	100	100	100	97.1
Under 5 years	8,996	4611	4385	6.3	6.6	6.1	105.2
Under 18 years	34,714	17,862	16,852	24.5	25.6	23.4	106
18 to 64 years	87,089	43,357	43,732	61.4	62.1	60.8	99.1
65 years and over	19,949	8,619	11,330	14.1	12.3	15.8	76.1
Median age (years)	39.5	38.6	40.4	(X)	(X)	(X)	(X)

Rockingham County							
Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
Total population	93,643	45,166	48,477	100	100	100	93.2
Under 5 years	5,205	2638	2567	5.6	5.8	5.3	102.8
Under 18 years	20,789	10,679	10,110	22.2	23.6	20.9	105.6
18 to 64 years	57,683	28,221	29,462	61.6	62.5	60.8	95.8
65 years and over	15,171	6,266	8,905	16.2	13.9	18.4	70.4
Median age (years)	42.2	40.9	43.5	(X)	(X)	(X)	(X)

Disability

The following table was completed using data from Census Table S1810, Disability Characteristics:

Caswell County						
Subject	Total		With a disability		Percent with a disability	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total civilian noninstitutionalized population	22,234	136	4,758	374	21.4%	1.7
SEX						
Male	10,871	142	2,397	247	22.0%	2.3
Female	11,363	72	2,361	230	20.8%	2
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	13,998	236	2,883	304	20.6%	2.2
Black or African American alone	7,182	309	1,630	232	22.7%	3.1
American Indian and Alaska Native alone	22	23	0	22	0.0%	63.2
Asian alone	133	22	37	29	27.8%	21.9
Native Hawaiian and Other Pacific Islander alone	31	34	0	22	0.0%	53.3
Some other race alone	430	217	0	22	0.0%	7.3
Two or more races	438	278	208	157	47.5%	17.8
White alone, not Hispanic or Latino	13,727	107	2,873	303	20.9%	2.2
Hispanic or Latino (of any race)	728	46	10	15	1.4%	2.1
AGE						
Under 5 years	1,082	41	18	24	1.7%	2.2
5 to 17 years	3,317	45	151	68	4.6%	2
18 to 34 years	3,936	108	258	96	6.6%	2.4
35 to 64 years	9,599	100	2,325	330	24.2%	3.4
65 to 74 years	2,655	43	878	146	33.1%	5.4
75 years and over	1,645	49	1,128	101	68.6%	6.1

Montgomery County						
Subject	Total		With a disability		Percent with a disability	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total civilian noninstitutionalized population	26,635	280	3,872	338	14.5%	1.3
SEX						
Male	12,868	329	1,800	226	14.0%	1.7
Female	13,767	211	2,072	221	15.1%	1.6
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	20,691	306	2,870	299	13.9%	1.5
Black or African American alone	4,732	250	946	164	20.0%	3.4
American Indian and Alaska Native alone	59	62	6	11	10.2%	26
Asian alone	424	10	19	35	4.5%	8.3
Native Hawaiian and Other Pacific Islander alone	4	7	4	7	100.0%	100
Some other race alone	433	249	3	7	0.7%	1.5
Two or more races	292	172	24	19	8.2%	5.7
White alone, not Hispanic or Latino	17,041	162	2,836	292	16.6%	1.7
Hispanic or Latino (of any race)	4118	34	37	29	0.9%	0.7
AGE						
Under 5 years	1,591	28	35	49	2.2%	3.1
5 to 17 years	4,765	21	119	61	2.5%	1.3
18 to 34 years	4,627	185	131	94	2.8%	2
35 to 64 years	10,694	248	1,745	214	16.3%	2
65 to 74 years	2,989	34	686	151	23.0%	5
75 years and over	1,969	76	1,156	137	58.7%	6.1

Randolph County						
Subject	Total		With a disability		Percent with a disability	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total civilian noninstitutionalized population	141,369	213	20,018	929	14.2%	0.7
SEX						
Male	69,627	178	9,857	700	14.2%	1
Female	71,742	173	10,161	585	14.2%	0.8
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	122,458	1120	17,854	848	14.6%	0.7
Black or African American alone	8,600	397	1,253	241	14.6%	2.9
American Indian and Alaska Native alone	637	265	91	50	14.3%	8.8
Asian alone	1541	197	87	48	5.6%	3.1
Native Hawaiian and Other Pacific Islander alone	13	19	13	19	100.0%	82.2
Some other race alone	5757	1160	310	114	5.4%	2.3
Two or more races	2363	445	410	117	17.4%	4.9
White alone, not Hispanic or Latino	113,308	256	17,529	835	15.5%	0.7
Hispanic or Latino (of any race)	15433	29	638	172	4.1%	1.1
AGE						
Under 5 years	8,222	75	54	44	0.7%	0.5
5 to 17 years	25,365	75	1474	317	5.8%	1.2
18 to 34 years	27,086	133	2065	357	7.6%	1.3
35 to 64 years	58,407	130	8,678	654	14.9%	1.1
65 to 74 years	13,586	113	3541	357	26.1%	2.6
75 years and over	8,703	183	4,206	326	48.3%	3.6

Rockingham County, North Carolina						
Subject	Total		With a disability		Percent with a disability	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total civilian noninstitutionalized population	90,850	243	15,154	893	16.7%	1
SEX						
Male	43,752	191	7,018	520	16.0%	1.2
Female	47,098	167	8,136	631	17.3%	1.3
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	68,810	640	11,515	742	16.7%	1.1
Black or African American alone	16,827	399	3,037	392	18.0%	2.4
American Indian and Alaska Native alone	471	104	80	56	17.0%	11.6
Asian alone	491	68	2	6	0.4%	1.3
Native Hawaiian and Other Pacific Islander alone	85	90	0	28	0.0%	30.7
Some other race alone	2251	572	149	150	6.6%	6.2
Two or more races	1915	431	371	167	19.4%	6.9
White alone, not Hispanic or Latino	66,164	226	11,395	748	17.2%	1.1
Hispanic or Latino (of any race)	5407	17	316	177	5.8%	3.3
AGE						
Under 5 years	4,796	37	26	31	0.5%	0.6
5 to 17 years	14,483	49	875	228	6.0%	1.6
18 to 34 years	16,569	140	1520	307	9.2%	1.9
35 to 64 years	38,808	159	7,135	610	18.4%	1.6
65 to 74 years	9,509	90	2450	274	25.8%	2.9
75 years and over	6,685	199	3,148	261	47.1%	4

Poverty

The following tables were completed using data from Census Table S1701, Poverty Status in the Past 12 Months:

Caswell County						
Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	22,161	144	4,888	696	22.1%	3.1
AGE						
Under 18 years	4,326	64	1,499	338	34.7%	7.7
Related children of householder under 18 years	4,313	66	1,486	340	34.5%	7.7
18 to 64 years	13,535	131	2,698	460	19.9%	3.4
65 years and over	4,300	62	691	148	16.1%	3.5
SEX						
Male	10,849	140	2,234	350	20.6%	3.2
Female	11,312	87	2,654	421	23.5%	3.7
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	13,947	235	2,481	517	17.8%	3.6
Black or African American alone	7,171	303	1,911	334	26.6%	4.5
American Indian and Alaska Native alone	22	23	5	10	22.7%	38.5
Asian alone	133	22	32	38	24.1%	29
Native Hawaiian and Other Pacific Islander alone	31	34	0	22	0.0%	53
Some other race alone	430	217	317	259	73.7%	37
Two or more races	427	277	142	133	33.3%	31
Hispanic or Latino origin (of any race)	728	46	384	226	52.7%	31
White alone, not Hispanic or Latino	13,676	116	2,419	510	17.7%	4
All Individuals below:						
50 percent of poverty level	1,694	440	(X)	(X)	(X)	(X)
125 percent of poverty level	5,944	706	(X)	(X)	(X)	(X)
150 percent of poverty level	6,999	744	(X)	(X)	(X)	(X)
185 percent of poverty level	8,553	749	(X)	(X)	(X)	(X)
200 percent of poverty level	9,625	774	(X)	(X)	(X)	(X)
300 percent of poverty level	14,289	768	(X)	(X)	(X)	(X)
400 percent of poverty level	18,017	619	(X)	(X)	(X)	(X)
500 percent of poverty level	19,727	484	(X)	(X)	(X)	(X)

Montgomery County						
Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	26,636	277	5,821	855	21.9%	3.2
AGE						
Under 18 years	6,334	51	2,049	489	32.3%	7.7
Related children of householder under 18 years	6,315	57	2,030	490	32.1%	7.8
18 to 64 years	15,344	274	3,179	464	20.7%	3
65 years and over	4,958	86	593	132	12.0%	2.7
SEX						
Male	12,867	331	2,486	436	19.3%	3.3
Female	13,769	211	3,335	521	24.2%	3.8
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	20,690	305	3,568	777	17.2%	3.8
Black or African American alone	4,734	248	1,956	330	41.3%	6.5
American Indian and Alaska Native alone	59	62	55	58	93.2%	8.9
Asian alone	424	10	0	22	0.0%	7
Native Hawaiian and Other Pacific Islander alone	4	7	0	22	0.0%	100
Some other race alone	433	249	156	162	36.0%	27
Two or more races	292	172	86	77	29.5%	22
Hispanic or Latino origin (of any race)	4118	34	738	378	17.9%	9
White alone, not Hispanic or Latino	17,040	165	2,983	691	17.5%	4
All Individuals below:						
50 percent of poverty level	2,032	380	(X)	(X)	(X)	(X)
125 percent of poverty level	8,158	891	(X)	(X)	(X)	(X)
150 percent of poverty level	9,739	807	(X)	(X)	(X)	(X)
185 percent of poverty level	11,957	831	(X)	(X)	(X)	(X)
200 percent of poverty level	12,953	807	(X)	(X)	(X)	(X)
300 percent of poverty level	18,088	609	(X)	(X)	(X)	(X)
400 percent of poverty level	21,291	693	(X)	(X)	(X)	(X)
500 percent of poverty level	23,340	570	(X)	(X)	(X)	(X)

Randolph County						
Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	140,911	253	23,757	1,796	16.9%	1.3
AGE						
Under 18 years	33,116	175	8,547	965	25.8%	2.9
Related children of householder under 18 years	32,846	238	8,277	940	25.2%	2.9
18 to 64 years	85,506	120	12,993	948	15.2%	1.1
65 years and over	22,289	195	2217	348	9.9%	1.6
SEX						
Male	69,352	202	10,985	1024	15.8%	1.5
Female	71,559	208	12,772	1062	17.8%	1.5
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	122,026	1150	17,807	1595	14.6%	1.3
Black or African American alone	8,586	397	2,537	492	29.5%	5.1
American Indian and Alaska Native alone	637	265	218	176	34.2%	21.8
Asian alone	1541	197	278	192	18.0%	12
Native Hawaiian and Other Pacific Islander alone	13	19	0	28	0.0%	82
Some other race alone	5753	1,160	2161	806	37.6%	10
Two or more races	2355	445	756	212	32.1%	9
Hispanic or Latino origin (of any race)	15418	36	5262	898	34.1%	6
White alone, not Hispanic or Latino	112,887	301	14,975	1,414	13.3%	1
All Individuals below:						
50 percent of poverty level	8,656	1,096	(X)	(X)	(X)	(X)
125 percent of poverty level	33,865	1,982	(X)	(X)	(X)	(X)
150 percent of poverty level	43,853	2,171	(X)	(X)	(X)	(X)
185 percent of poverty level	54,507	2,183	(X)	(X)	(X)	(X)
200 percent of poverty level	58,680	2,342	(X)	(X)	(X)	(X)
300 percent of poverty level	87,439	2,248	(X)	(X)	(X)	(X)
400 percent of poverty level	107,799	1,671	(X)	(X)	(X)	(X)
500 percent of poverty level	120,579	1,234	(X)	(X)	(X)	(X)

Rockingham County						
Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	90,382	326	17,517	1,477	19.4%	1.6
AGE						
Under 18 years	18,790	211	5,374	696	28.6%	3.7
Related children of householder under 18 years	18,668	236	5,260	702	28.2%	3.7
18 to 64 years	55,398	167	10,500	932	19.0%	1.7
65 years and over	16,194	231	1,643	293	10.1%	1.8
SEX						
Male	43,534	235	7,651	744	17.6%	1.7
Female	46,848	230	9,866	970	21.1%	2.1
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	68,453	649	10,611	1115	15.5%	1.6
Black or African American alone	16,790	407	5,142	844	30.6%	4.8
American Indian and Alaska Native alone	471	104	85	78	18.0%	16.1
Asian alone	491	68	133	112	27.1%	21
Native Hawaiian and Other Pacific Islander alone	85	90	0	28	0.0%	31
Some other race alone	2,207	563	830	495	37.6%	18
Two or more races	1,885	426	716	320	38.0%	12
Hispanic or Latino origin (of any race)	5,334	75	1,383	515	25.9%	10
White alone, not Hispanic or Latino	65,836	271	10,267	1,077	15.6%	2
All Individuals below:						
50 percent of poverty level	7,976	1,190	(X)	(X)	(X)	(X)
125 percent of poverty level	23,615	1,629	(X)	(X)	(X)	(X)
150 percent of poverty level	28,955	1,764	(X)	(X)	(X)	(X)
185 percent of poverty level	36,216	1,674	(X)	(X)	(X)	(X)
200 percent of poverty level	38,998	1,616	(X)	(X)	(X)	(X)
300 percent of poverty level	56,631	1,681	(X)	(X)	(X)	(X)
400 percent of poverty level	68,967	1,400	(X)	(X)	(X)	(X)
500 percent of poverty level	77,814	1,172	(X)	(X)	(X)	(X)

Household Income

The following tables were completed using data from Census Table S1901, Income in the Past 12 Months (In 2016 Inflation-Adjusted Dollars):

Caswell County		
	Households	
Subject	Estimate	Margin of Error
Total	8,874	246
Less than \$10,000	9.30%	2
\$10,000 to \$14,999	9.3%	2
\$15,000 to \$24,999	14.0%	2
\$25,000 to \$34,999	13.0%	2.2
\$35,000 to \$49,999	17.0%	2.6
\$50,000 to \$74,999	18.8%	2.9
\$75,000 to \$99,999	9.50%	1.8
\$100,000 to \$149,999	6.0%	1.5
\$150,000 to \$199,999	1.9%	1
\$200,000 or more	1.2%	0.7
Median income (dollars)	\$ 38,310	\$ 1,619
Mean income (dollars)	\$ 49,154	\$ 3,134

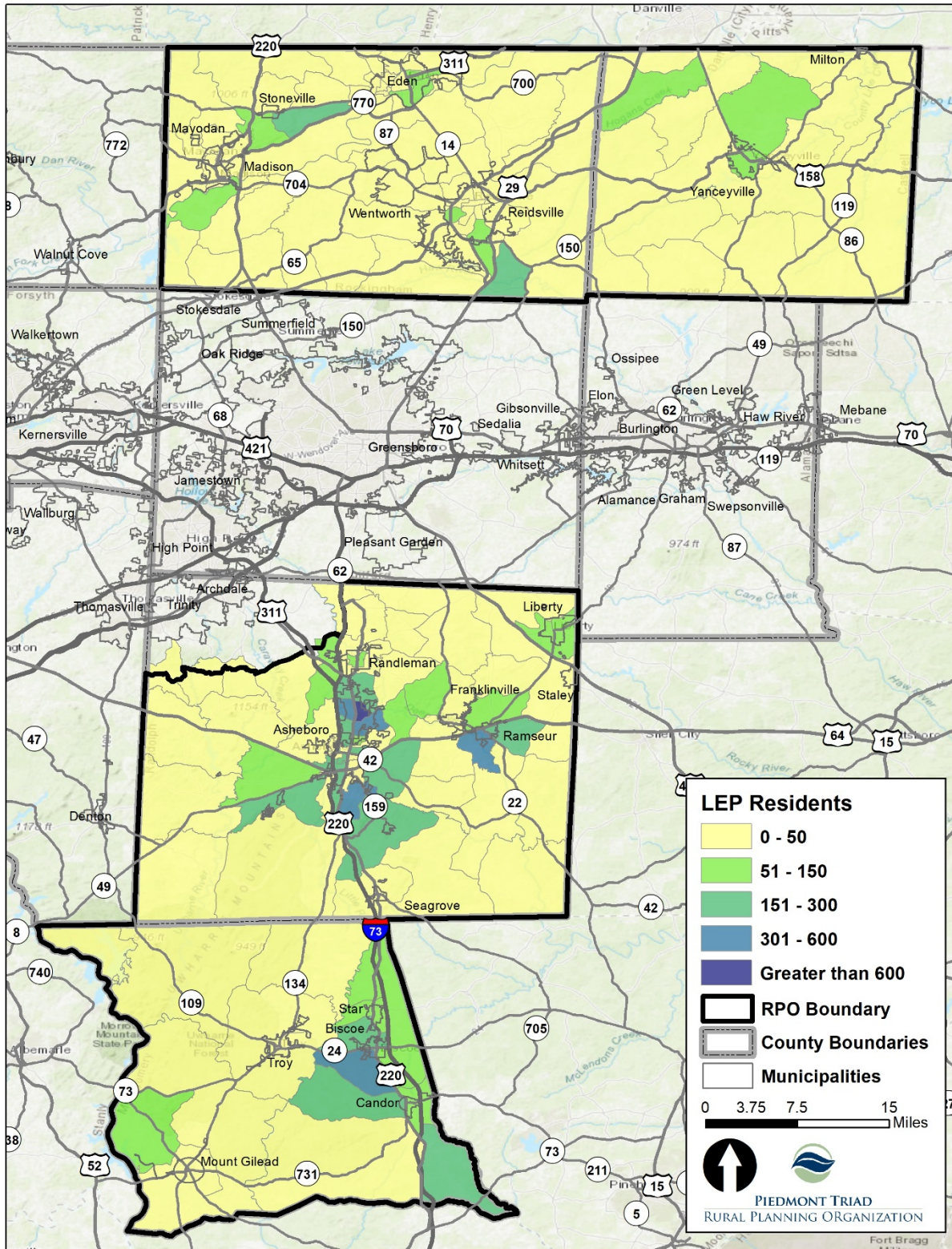
Caswell County		
	Households	
Subject	Estimate	Margin of Error
Total	8,874	246
Less than \$10,000	9.30%	2
\$10,000 to \$14,999	9.3%	2
\$15,000 to \$24,999	14.0%	2
\$25,000 to \$34,999	13.0%	2.2
\$35,000 to \$49,999	17.0%	2.6
\$50,000 to \$74,999	18.8%	2.9
\$75,000 to \$99,999	9.50%	1.8
\$100,000 to \$149,999	6.0%	1.5
\$150,000 to \$199,999	1.9%	1
\$200,000 or more	1.2%	0.7
Median income (dollars)	\$ 38,310	\$ 1,619
Mean income (dollars)	\$ 49,154	\$ 3,134

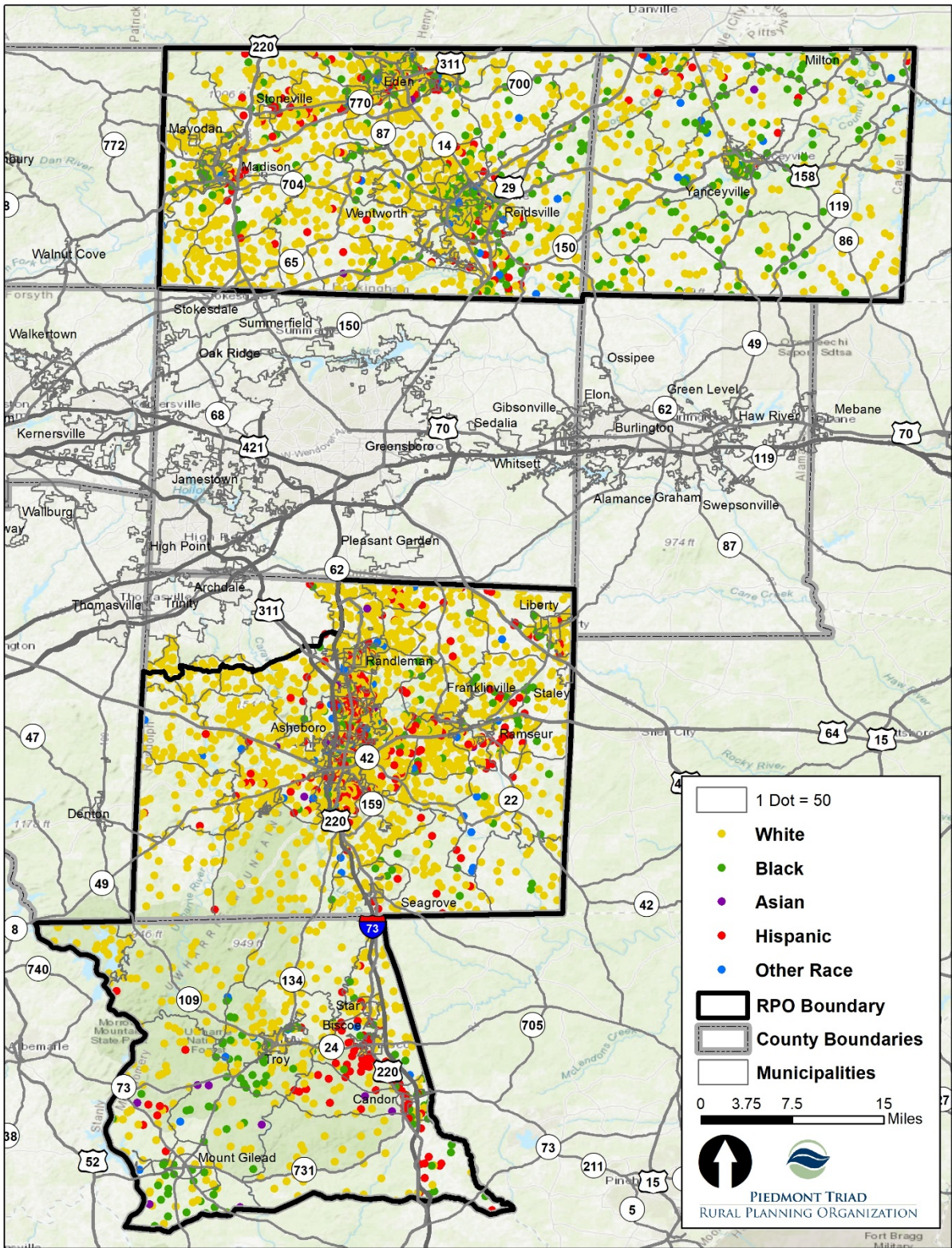
Montgomery County		
	Households	
Subject	Estimate	Margin of Error
Total	10,781	392
Less than \$10,000	9.70%	1.8
\$10,000 to \$14,999	9.2%	1.8
\$15,000 to \$24,999	15.6%	2.6
\$25,000 to \$34,999	15.8%	2.3
\$35,000 to \$49,999	13.6%	2.3
\$50,000 to \$74,999	17.6%	2.1
\$75,000 to \$99,999	7.20%	1.3
\$100,000 to \$149,999	8.0%	1.7
\$150,000 to \$199,999	1.9%	0.8
\$200,000 or more	1.5%	0.6
Median income (dollars)	\$ 34,819	\$ 2,537
Mean income (dollars)	\$ 50,710	\$ 3,081

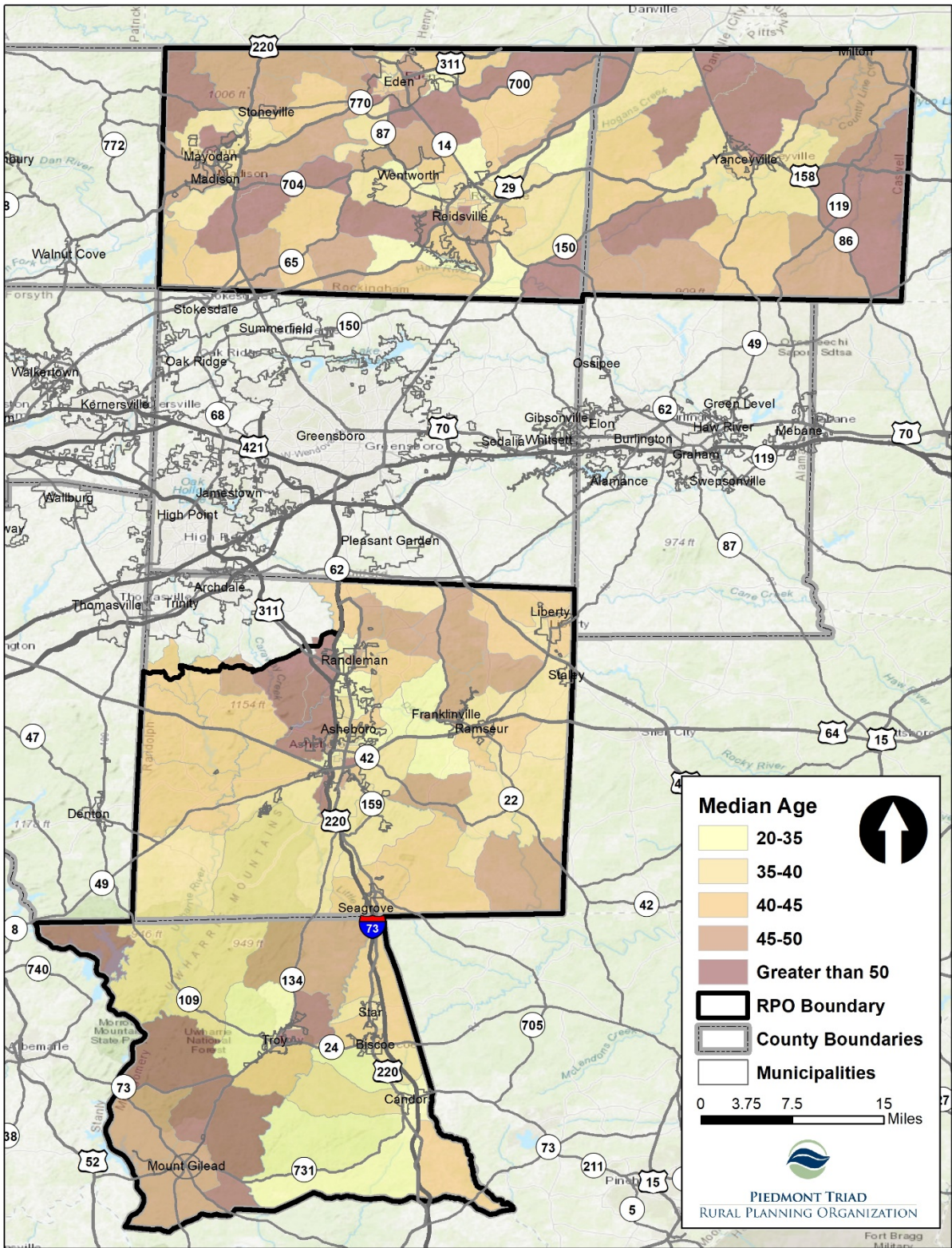
Randolph County		
	Households	
Subject	Estimate	Margin of Error
Total	54,884	621
Less than \$10,000	6.40%	0.8
\$10,000 to \$14,999	7.2%	0.6
\$15,000 to \$24,999	13.1%	0.9
\$25,000 to \$34,999	13.5%	1.1
\$35,000 to \$49,999	16.4%	1.1
\$50,000 to \$74,999	19.3%	1.1
\$75,000 to \$99,999	11.60%	0.9
\$100,000 to \$149,999	9.0%	0.8
\$150,000 to \$199,999	2.4%	0.4
\$200,000 or more	1.1%	0.3
Median income (dollars)	\$ 43,010	\$ 1,197
Mean income (dollars)	\$ 54,976	\$ 1,517

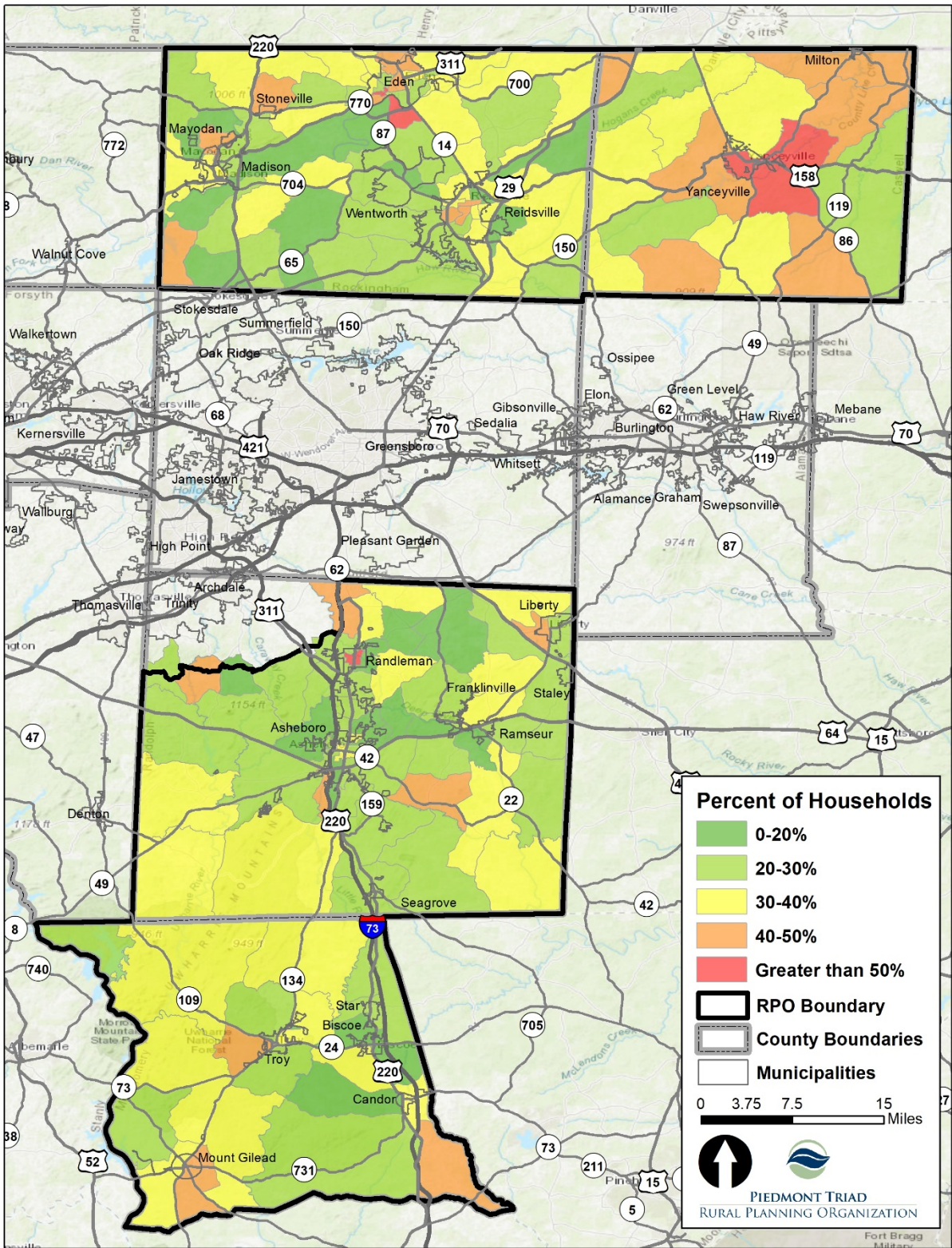
Rockingham County		
	Households	
Subject	Estimate	Margin of Error
Total	37,503	585
Less than \$10,000	9.60%	1.2
\$10,000 to \$14,999	8.1%	0.8
\$15,000 to \$24,999	14.6%	1.2
\$25,000 to \$34,999	12.3%	1.1
\$35,000 to \$49,999	16.2%	1.3
\$50,000 to \$74,999	16.2%	1.4
\$75,000 to \$99,999	12.20%	1.2
\$100,000 to \$149,999	7.5%	0.9
\$150,000 to \$199,999	2.2%	0.5
\$200,000 or more	1.0%	0.3
Median income (dollars)	\$ 40,003	\$ 1,438
Mean income (dollars)	\$ 50,754	\$ 1,476

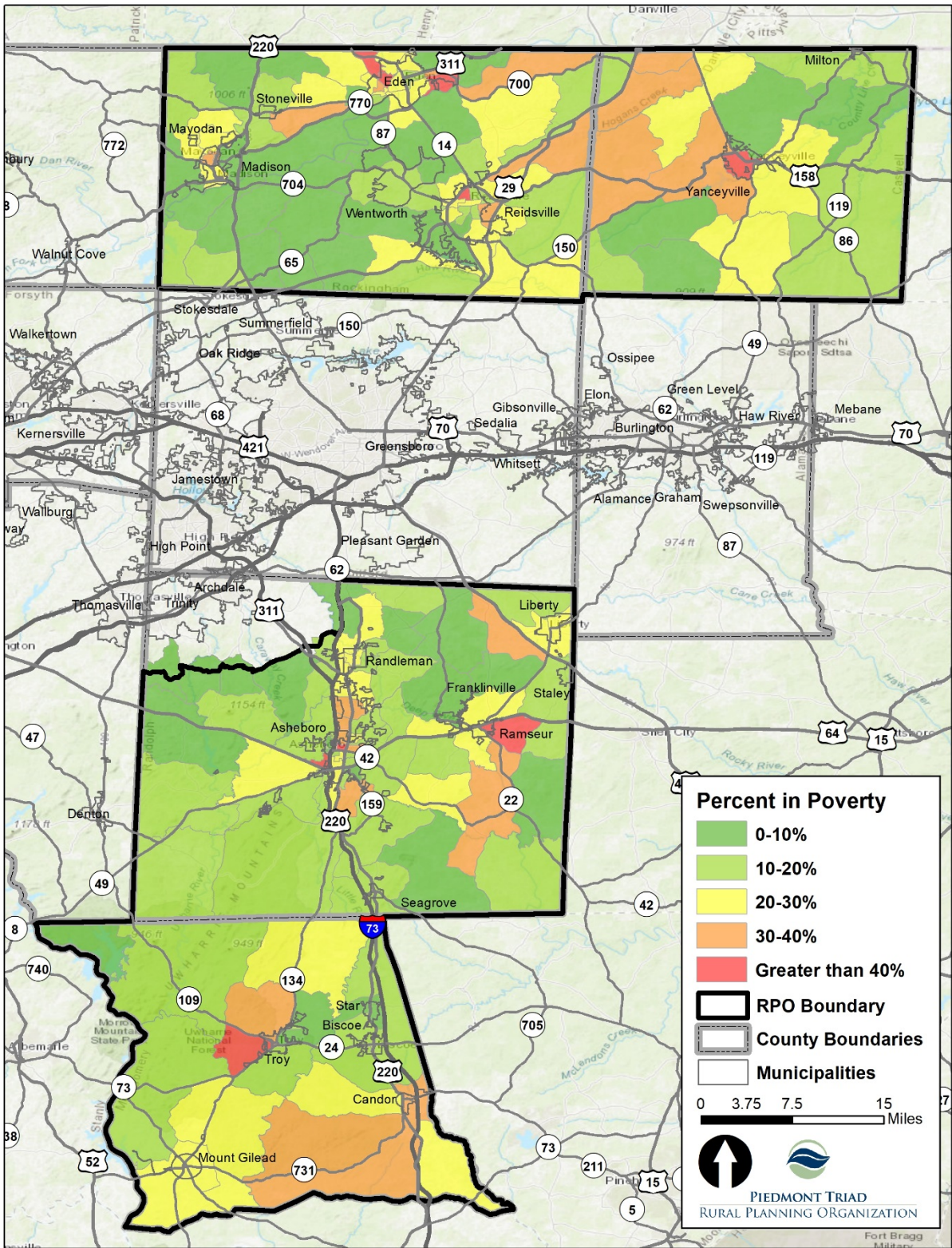
Appendix E: Demographic Maps (EJ)

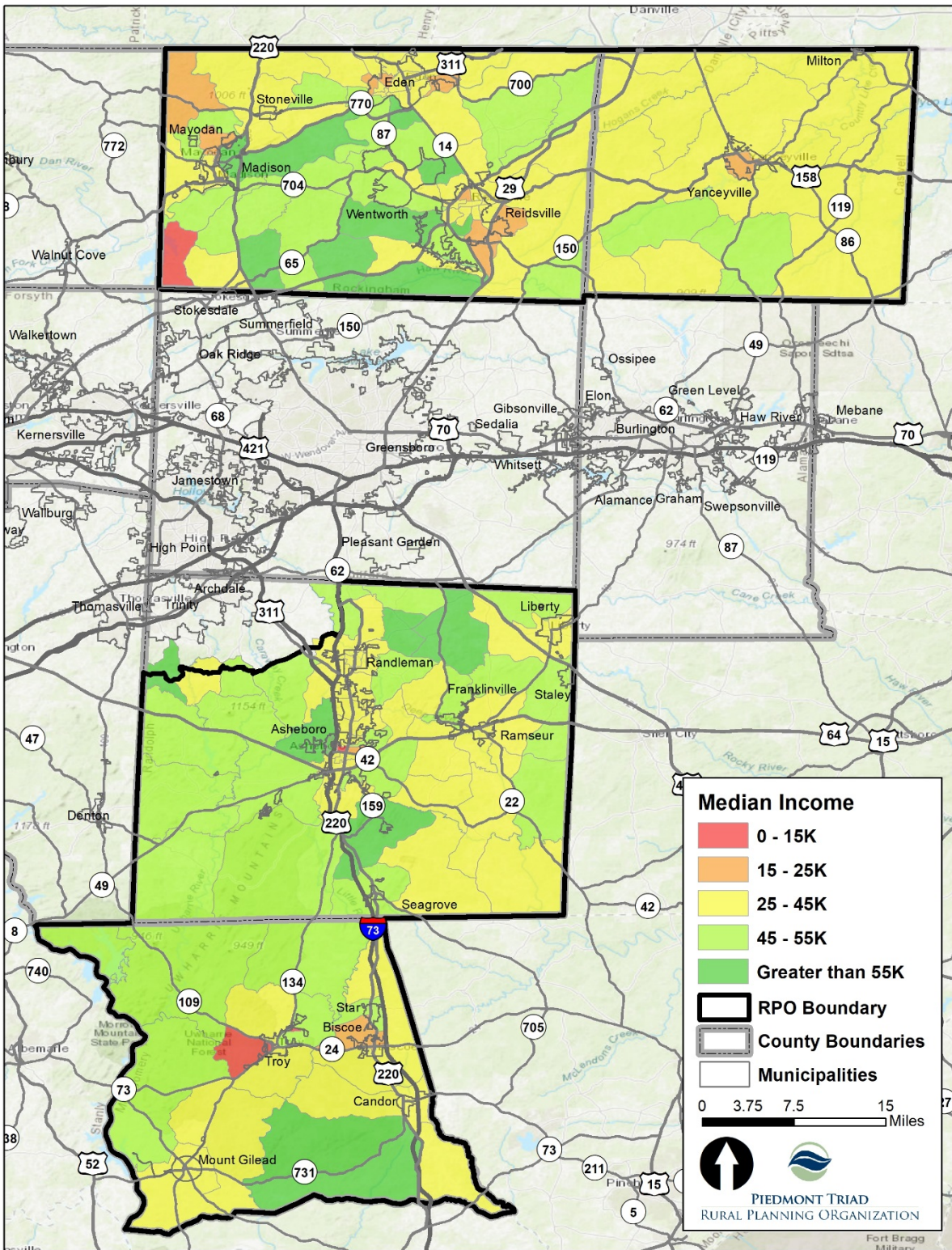












Appendix F: Investigation Guidance, Discrimination Complaint Form & Log

Investigative Guidance

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

Sample Investigative Report Template

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

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

III. APPLICABLE LAW/REGULATION

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

IV. COMPLAINT BASIS/(ES)

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

V. ALLEGATIONS

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

Issue #1 – Complainant alleges that transit system failed to inform minority communities of rate increases.

Issue #2 – Complainant alleges that transit system has not sufficiently publicized or held public meetings to share information regarding fare increases and route changes that impacts low-income and minority citizens.

VI. BACKGROUND

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

VII. INVESTIGATIVE PROCEDURE

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

VIII. FINDINGS OF FACT

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

IX. CONCLUSION

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

X. RECOMMENDED ACTIONS

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

APPENDIX

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

**Piedmont Triad Rural Planning Organization
Discrimination Complaint Form**

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

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

Identify the Category of Discrimination:

<input type="checkbox"/> RACE	<input type="checkbox"/> COLOR	<input type="checkbox"/> NATIONAL ORIGIN	<input type="checkbox"/> AGE
<input type="checkbox"/> SEX	<input type="checkbox"/> DISABILITY	<input type="checkbox"/> LIMITED ENGLISH PROFICIENCY	

Identify the Race of the Complainant

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

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

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

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

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. _____	_____	_____

**Piedmont Triad Rural Planning Organization
Discrimination Complaint Form, continued.**

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 Piedmont Triad Rural Planning Organization (PTRPO) 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:
 Piedmont Triad Rural Planning Organization
 1398 Carrollton Crossing Drive
 Kernersville, NC 27284
 336-904-0300

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: NCDOT FHWA Date Referred: _____

Discrimination Complaints Log

Log Year(s):

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

No Complaints or Lawsuits

I certify that to the best of my knowledge, the above described complaints or lawsuits alleging discrimination, or **no complaints or lawsuits** alleging discrimination, have been filed with or against **Official Organization Name** 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 G: Compliance Review Checklist for FHWA Subrecipients

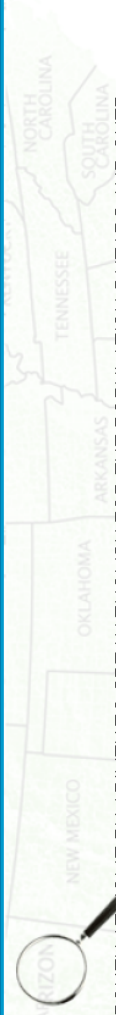
General Requirements	Completed
1. A copy of the recipient's signed USDOT Title VI Assurances	<input type="checkbox"/>
2. Title VI Policy Statement (signed)	<input type="checkbox"/>
3. Title VI Notice to Public, including a list of locations where the notice is posted	<input type="checkbox"/>
4. Name 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"/>

Appendix H: 2009-2013 American Community Survey 5-Year Estimates

The tables begin on the following page.

B16001

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
Universe: Population 5 years and over
2009-2013 American Community Survey 5-Year Estimates



Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.
Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic, and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

	Caswell County, North Carolina		Montgomery County, North Carolina		Randolph County, North Carolina	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total:	22,308	+/-55	26,020	+/-10	133,213	+/-40
Speak only English	21,600	+/-136	21,863	+/-223	119,093	+/-605
Spanish or Spanish Creole:	635	+/-138	3,606	+/-204	12,130	+/-546
Speak English "very well"	330	+/-125	1,759	+/-284	6,248	+/-568
Speak English less than "very well"	305	+/-96	1,847	+/-209	5,882	+/-563
French (incl. Patois, Cajun):	14	+/-16	38	+/-43	155	+/-101
Speak English "very well"	14	+/-16	34	+/-41	137	+/-95
Speak English less than "very well"	0	+/-23	4	+/-8	18	+/-26
French Creole:	0	+/-23	0	+/-23	0	+/-29
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Italian:	7	+/-11	0	+/-23	85	+/-82
Speak English "very well"	7	+/-11	0	+/-23	85	+/-82
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Portuguese or Portuguese Creole:	0	+/-23	14	+/-22	30	+/-48
Speak English "very well"	0	+/-23	0	+/-23	13	+/-22
Speak English less than "very well"	0	+/-23	14	+/-22	17	+/-27
German:	3	+/-7	20	+/-23	245	+/-150
Speak English "very well"	3	+/-7	20	+/-23	227	+/-149

	Caswell County, North Carolina		Montgomery County, North Carolina		Randolph County, North Carolina	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Speak English less than "very well"	0	+/-23	0	+/-23	18	+/-29
Yiddish:	0	+/-23	0	+/-23	0	+/-29
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Other West Germanic languages:	11	+/-17	0	+/-23	0	+/-29
Speak English "very well"	11	+/-17	0	+/-23	0	+/-29
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Scandinavian languages:	0	+/-23	0	+/-23	0	+/-29
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Greek:	11	+/-16	0	+/-23	8	+/-14
Speak English "very well"	11	+/-16	0	+/-23	8	+/-14
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Russian:	0	+/-23	0	+/-23	0	+/-29
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Polish:	0	+/-23	14	+/-22	2	+/-4
Speak English "very well"	0	+/-23	0	+/-23	2	+/-4
Speak English less than "very well"	0	+/-23	14	+/-22	0	+/-29
Serbo-Croatian:	0	+/-23	0	+/-23	0	+/-29
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Other Slavic languages:	0	+/-23	0	+/-23	0	+/-29
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Amenian:	0	+/-23	0	+/-23	13	+/-21
Speak English "very well"	0	+/-23	0	+/-23	13	+/-21
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Persian:	0	+/-23	0	+/-23	11	+/-18
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29
Speak English less than "very well"	0	+/-23	0	+/-23	11	+/-18
Gujarati:	0	+/-23	0	+/-23	30	+/-52
Speak English "very well"	0	+/-23	0	+/-23	30	+/-52
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Hindi:	0	+/-23	0	+/-23	44	+/-44
Speak English "very well"	0	+/-23	0	+/-23	44	+/-44
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Urdu:	0	+/-23	0	+/-23	237	+/-144
Speak English "very well"	0	+/-23	0	+/-23	108	+/-78
Speak English less than "very well"	0	+/-23	0	+/-23	129	+/-90
Other Indic languages:	0	+/-23	0	+/-23	129	+/-135
Speak English "very well"	0	+/-23	0	+/-23	56	+/-51
Speak English less than "very well"	0	+/-23	0	+/-23	73	+/-88
Other Indo-European languages:	0	+/-23	0	+/-23	28	+/-44

	Caswell County, North Carolina			Montgomery County, North Carolina			Randolph County, North Carolina		
	Estimate	Margin of Error		Estimate	Margin of Error		Estimate	Margin of Error	
Speak English "very well"	0	+/-23	0	+/-23	0	+/-23	28	+/-44	
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-23	0	+/-29	
Chinese:	22	+/-34	117	+/-74	127	+/-136			
Speak English "very well"	0	+/-23	57	+/-34	48	+/-59			
Speak English less than "very well"	22	+/-34	60	+/-44	79	+/-85			
Japanese:	0	+/-23	0	+/-23	72	+/-75			
Speak English "very well"	0	+/-23	0	+/-23	43	+/-68			
Speak English less than "very well"	0	+/-23	0	+/-23	29	+/-31			
Korean:	0	+/-23	10	+/-14	4	+/-8			
Speak English "very well"	0	+/-23	6	+/-13	4	+/-8			
Speak English less than "very well"	0	+/-23	4	+/-6	0	+/-29			
Mon-Khmer, Cambodian:	0	+/-23	22	+/-40	0	+/-29			
Speak English "very well"	0	+/-23	8	+/-17	0	+/-29			
Speak English less than "very well"	0	+/-23	14	+/-24	0	+/-29			
Hmong:	0	+/-23	82	+/-80	104	+/-170			
Speak English "very well"	0	+/-23	59	+/-64	0	+/-29			
Speak English less than "very well"	0	+/-23	23	+/-36	104	+/-170			
Thai:	0	+/-23	0	+/-23	4	+/-7			
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29			
Speak English less than "very well"	0	+/-23	0	+/-23	4	+/-7			
Lactian:	0	+/-23	208	+/-114	34	+/-74			
Speak English "very well"	0	+/-23	96	+/-95	28	+/-60			
Speak English less than "very well"	0	+/-23	112	+/-72	6	+/-15			
Vietnamese:	0	+/-23	4	+/-6	402	+/-228			
Speak English "very well"	0	+/-23	0	+/-23	137	+/-92			
Speak English less than "very well"	0	+/-23	4	+/-6	265	+/-167			
Other Asian languages:	0	+/-23	0	+/-23	0	+/-29			
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29			
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29			
Tagalog:	5	+/-9	3	+/-7	96	+/-74			
Speak English "very well"	5	+/-9	0	+/-23	96	+/-74			
Speak English less than "very well"	0	+/-23	3	+/-7	0	+/-29			
Other Pacific Island languages:	0	+/-23	0	+/-23	60	+/-66			
Speak English "very well"	0	+/-23	0	+/-23	29	+/-26			
Speak English less than "very well"	0	+/-23	0	+/-23	31	+/-47			
Navajo:	0	+/-23	0	+/-23	0	+/-29			
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29			
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29			
Other Native North American languages:	0	+/-23	8	+/-6	18	+/-31			
Speak English "very well"	0	+/-23	8	+/-6	18	+/-31			
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29			
Hungarian:	0	+/-23	0	+/-23	0	+/-29			
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29			
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29			

	Caswell County, North Carolina		Montgomery County, North Carolina		Randolph County, North Carolina	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Arabic:	0	+/-23	11	+/-21	51	+/-58
Speak English "very well"	0	+/-23	11	+/-21	38	+/-55
Speak English less than "very well"	0	+/-23	0	+/-23	13	+/-21
Hebrew:	0	+/-23	0	+/-23	0	+/-29
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
African languages:	0	+/-23	0	+/-23	0	+/-29
Speak English "very well"	0	+/-23	0	+/-23	0	+/-29
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29
Other and unspecified languages:	0	+/-23	0	+/-23	1	+/-3
Speak English "very well"	0	+/-23	0	+/-23	1	+/-3
Speak English less than "very well"	0	+/-23	0	+/-23	0	+/-29

Rockingham County, North Carolina		
	Estimate	Margin of Error
Total:	87,972	+/-53
Speak only English	82,934	+/-351
Spanish or Spanish Creole:	4,346	+/-307
Speak English "very well"	2,286	+/-325
Speak English less than "very well"	2,060	+/-283
French (incl. Patois, Cajun):	41	+/-33
Speak English "very well"	29	+/-30
Speak English less than "very well"	12	+/-15
French Creole:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Italian:	34	+/-36
Speak English "very well"	34	+/-36
Speak English less than "very well"	0	+/-29
Portuguese or Portuguese Creole:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
German:	164	+/-113
Speak English "very well"	120	+/-75
Speak English less than "very well"	44	+/-60
Yiddish:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Other West Germanic languages:	32	+/-34
Speak English "very well"	32	+/-34
Speak English less than "very well"	0	+/-29
Scandinavian languages:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Greek:	22	+/-35
Speak English "very well"	22	+/-35
Speak English less than "very well"	0	+/-29
Russian:	15	+/-24
Speak English "very well"	15	+/-24
Speak English less than "very well"	0	+/-29
Polish:	7	+/-11
Speak English "very well"	0	+/-29
Speak English less than "very well"	7	+/-11
Serbo-Croatian:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Other Slavic languages:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29

Rockingham County, North Carolina		
	Estimate	Margin of Error
Armenian:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Persian:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Gujarati:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Hindi:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Urdu:	19	+/-31
Speak English "very well"	0	+/-29
Speak English less than "very well"	19	+/-31
Other Indic languages:	20	+/-36
Speak English "very well"	7	+/-13
Speak English less than "very well"	13	+/-24
Other Indo-European languages:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Chinese:	66	+/-72
Speak English "very well"	26	+/-29
Speak English less than "very well"	40	+/-49
Japanese:	47	+/-59
Speak English "very well"	0	+/-29
Speak English less than "very well"	47	+/-59
Korean:	42	+/-60
Speak English "very well"	0	+/-29
Speak English less than "very well"	42	+/-60
Mon-Khmer, Cambodian:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Hmong:	18	+/-27
Speak English "very well"	0	+/-29
Speak English less than "very well"	18	+/-27
Thai:	32	+/-50
Speak English "very well"	0	+/-29
Speak English less than "very well"	32	+/-50
Lactian:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Vietnamese:	0	+/-29
Speak English "very well"	0	+/-29

Rockingham County, North Carolina		
	Estimate	Margin of Error
Speak English less than "very well"	0	+/-29
Other Asian languages:	46	+/-67
Speak English "very well"	46	+/-67
Speak English less than "very well"	0	+/-29
Tagalog:	45	+/-37
Speak English "very well"	21	+/-31
Speak English less than "very well"	24	+/-25
Other Pacific Island languages:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Navajo:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Other Native North American languages:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Hungarian:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Arabic:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
Hebrew:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29
African languages:	42	+/-59
Speak English "very well"	12	+/-18
Speak English less than "very well"	30	+/-55
Other and unspecified languages:	0	+/-29
Speak English "very well"	0	+/-29
Speak English less than "very well"	0	+/-29

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using multi-year data containing data from 2013.

While the 2009-2013 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas, in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

Explanation of Symbols:

1. An "..." entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An "!" entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An "L" following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An "U" following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An "..." entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An "N" entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An "N" entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An "(X)" means that the estimate is not applicable or not available.