



NORTHWEST PIEDMONT  
RURAL PLANNING ORGANIZATION

# Title VI Program Plan



**DRAFT**

Adopted October XX, 2019

## TABLE OF CONTENTS

<b>Title VI Policy Statement and Notice of Nondiscrimination .....</b>	<b>3</b>
<b>Standard USDOT Title VI Assurances .....</b>	<b>3</b>
<b>Organization &amp; Staffing .....</b>	<b>4</b>
<b>Environmental Justice (EJ) .....</b>	<b>5</b>
<b>Data Collection/Analysis/Reporting .....</b>	<b>5</b>
<b>Limited English Proficiency (LEP) .....</b>	<b>6</b>
<b>Dissemination of Information .....</b>	<b>9</b>
<b>External Discrimination Complaints .....</b>	<b>12</b>
<b>Review of Organizational Directives .....</b>	<b>14</b>
<b>Title VI Training .....</b>	<b>14</b>
<b>Compliance and Enforcement Procedures .....</b>	<b>14</b>

## TITLE VI POLICY STATEMENT AND NOTICE OF NONDISCRIMINATION

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It is the policy of the Northwest Piedmont Rural Planning Organization (NWPRPO) 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.

Lawrence Holdsworth  
1398 Carrollton Crossing Drive  
336-904-0300  
nwprpo@ptrc.org

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

*Signature*

\_\_\_\_\_  
Lawrence Holdsworth

\_\_\_\_\_  
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 Coordinator of Northwest Piedmont Rural Planning Organization, and re-signed whenever a new person assumes that position.
- The signed statement will be posted on office bulletin boards, near the receptionist's desk, in meeting rooms, and disseminated within brochures and other written materials.
- The statement will be incorporated into Title VI training and acknowledgement activities.
- The statement will be posted or disseminated in languages other than English, when appropriate.
- Low-income will be applicable to our programs, policies and activities under Environmental Justice when determining if there will be disproportionately high and adverse effects.

## STANDARD USDOT TITLE VI ASSURANCES

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

## ORGANIZATION & STAFFING

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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 State Planning Research funds from NCDOT's Transportation Planning Division (TPD).

The Northwest Piedmont RPO was established in 2002. Our planning area includes the following counties: Davie, Stokes, Surry, and Yadkin. Our Transportation Advisory Committee (TAC) is composed of a commissioner from each county, one elected official from each municipality, one Board of Transportation member and meets bimonthly. Our Technical Coordinating Committee (TCC) is composed of one senior staff from each county and municipality, Division Engineers, transit and MPO representatives, a TPD staff, PTRC staff and meets bimonthly. Please refer to **Appendix B** for lists of current TAC and TCC members with race, gender, and affiliation included.

### 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 Title VI Coordinator changes, the Title VI Policy Statement and USDOT Title VI Assurances, will immediately be updated, and an updated policy statement (and nondiscrimination agreement, if standalone) will be signed by the new Title VI Coordinator.

### Staffing

We currently employ a staff of four, 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)**

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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, NWRPO 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, NWRPO 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 NWRPO will take to ensure meaningful access by LEP persons to all benefits, services and information provided under our programs and activities. A four factor analysis was conducted to determine the LEP language groups present in our planning area and the specific language services that are needed.

### Four Factor Analysis

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

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

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

Davie County				
LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
<b>Total (population 5 years and over):</b>	39,081	65	100.0%	0.2%
Speak only English	36,170	258	92.6%	0.7%
Spanish or Spanish Creole:	2,343	170	6.0%	0.4%
Speak English "very well"	1,244	261	3.2%	0.7%
Speak English less than "very well"	1,099	225	2.8%	0.6%

Other West Germanic languages:	113	141	0.3%	0.4%
Speak English "very well"	53	71	0.1%	0.2%
Speak English less than "very well"	60	71	0.2%	0.2%
Spanish or Spanish Creole:	80	66	0.2%	0.2%
Speak English "very well"	80	66	0.2%	0.2%
Speak English less than "very well"	0	22	0.0%	0.1%
<b>Stokes County</b>				
<b>LANGUAGE SPOKEN AT HOME</b>	<b>Estimate</b>	<b>Margin of Error</b>	<b>Percent of Population</b>	<b>Margin of Error</b>
Total (population 5 years and over):	44,647	103	100.0%	0.2%
Speak only English	43,219	255	96.8%	0.6%
Spanish or Spanish Creole:	1,089	150	2.4%	0.3%
Speak English "very well"	518	148	1.2%	0.3%
Speak English less than "very well"	571	153	1.3%	0.3%
German:	78	68	0.2%	0.2%
Speak English "very well"	62	49	0.1%	0.1%
Speak English less than "very well"	16	27	0.0%	0.1%
Russian:	63	75	0.1%	0.2%
Speak English "very well"	63	75	0.1%	0.2%
Speak English less than "very well"	0	26	0.0%	0.1%
<b>Surry County</b>				
<b>LANGUAGE SPOKEN AT HOME</b>	<b>Estimate</b>	<b>Margin of Error</b>	<b>Percent of Population</b>	<b>Margin of Error</b>
Total (population 5 years and over):	69,195	50	100.0%	0.1%
Speak only English	62,615	420	90.5%	0.6%
Spanish or Spanish Creole:	5,839	368	8.4%	0.5%
Speak English "very well"	2,562	366	3.7%	0.5%
Speak English less than "very well"	3,277	341	4.7%	0.5%
Italian:	78	116	0.1%	0.2%
Speak English "very well"	78	116	0.1%	0.2%
Speak English less than "very well"	0	29	0.0%	0.0%
Other Slavic languages:	68	102	0.1%	0.1%
Speak English "very well"	52	78	0.1%	0.1%
Speak English less than "very well"	16	24	0.0%	0.0%
<b>Yadkin County</b>				

LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
<b>Total (population 5 years and over):</b>	36,047	5	100.0%	0.0%
<b>Speak only English</b>	32,717	374	90.8%	1.0%
<b>Spanish or Spanish Creole:</b>	3,008	294	8.3%	0.8%
<b>Speak English "very well"</b>	1,734	308	4.8%	0.9%
<b>Speak English less than "very well"</b>	1,274	223	3.5%	0.6%
<b>Other West Germanic languages:</b>	170	171	0.5%	0.5%
<b>Speak English "very well"</b>	103	126	0.3%	0.3%
<b>Speak English less than "very well"</b>	67	82	0.2%	0.2%
<b>German:</b>	69	64	0.2%	0.2%
<b>Speak English "very well"</b>	45	49	0.1%	0.1%
<b>Speak English less than "very well"</b>	24	37	0.1%	0.1%

Language groups meeting the 5% or 1000 threshold in the NWRPO boundary are Spanish or Spanish Creole. This is true for Davie, Surry, and Yadkin County, with the largest population found in Surry County. While most municipalities within the NWRPO have significant Spanish speaking populations with limited English proficiency, referring to the map, we find this particularly evident surrounding Yadkinville and East Bend in Yadkin County. West of Elkin in Surry County demonstrates the largest number of LEP residents in the NWRPO, with a significant population also found west of Dobson. In Stokes County, one census block group northeast of Danbury shows comparatively elevated numbers of LEP residents. Knowledge of local industry contributes to the reasonable assumption that many of these residents are employed in agribusiness.

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

It has not been documented that LEP communities are coming into regular contact with NWRPO programs and there is a need to strengthen communication strategies generally, and particularly to populations that are difficult to reach. The primary way that LEP residents will interface with the RPO is through public meetings, press releases, surveys, and web content. These types of communications are issued once a month on average, with web content being available at all times at the discretion of the user.

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

In the development of an equitable multimodal transportation network it is critical that all groups of users have the opportunity to contribute the planning and prioritization of improvements. There are few residents that do not rely on transportation networks in some way, whether for work and personal trips or the efficient movement of goods and services. To insure that all NWRPO area residents have equal and ample opportunity to participate in and be informed of planning processes, communication strategies must be in place to insure that public meetings, advertisements, web content, surveys, and documents are widely dispersed.

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

Translation Services

Web: Google Translate: No Charge  
Public Meetings: \$55 per hour  
Telephone:  
Documents:

In addition to these basic translation services NWRPO has identified potential community partners that can assist in outreach to LEP communities including the QuePasa Media Network, The Activa Network, and The Hispanic League. Furthermore, outreach to school districts and other county based service provider is likely to prove instrumental in identifying potential interfaces with LEP communities. Faith based organizations are another promising opportunity to expand outreach in these communities. Finally, local businesses, either those serving or employing a significant percentage of Spanish speakers should be identified and included in efforts to disseminate information to these residents.

## **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.

### *Specific Measures by Language Group*

- Spanish:

### **Written Translation and Oral Interpretation**

Vital documents will be translated for each eligible LEP language group in our service area that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be encountered.

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

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

### **Staff Support for Language Assistance**

- Our staff (including receptionists) 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**

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In accordance with 23 CFR 200.9(b)(12) and 49 CFR 21.9(d), Northwest Piedmont 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:
  - “Northwest Piedmont Rural Planning Organization (NWPRPO) 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; nwprpo@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: [www.ptrc.org/nwprpo]

## PUBLIC INVOLVEMENT

Effective public involvement is a key element in addressing Title VI in decision-making. This **Public Participation Plan** describes how Northwest Piedmont Rural Planning Organization (NWPRPO) 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 to include locations where informal community gatherings occur.
- 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**

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

- **Northwest Piedmont 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. <i>(Executive Order 13166)</i>
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

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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

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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

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FHWA recipients must have mechanisms in place to enforce compliance with Title VI. Northwest Piedmont Rural Planning Organization utilizes internal training, meetings, monitoring contractors, technical assistance, and findings from periodic NCDOT reviews to identify deficiencies and potential discrimination. If NCDOT identifies deficiencies, Northwest Piedmont Rural Planning Organization will correct all deficiencies within 90 days based on a Corrective Action Plan (CAP). If attempts by NCDOT to resolve a compliance issue are unsuccessful, NCDOT may take any or all of the following steps with FHWA's concurrence:

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

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

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

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

## Appendix A



### United States Department of Transportation STANDARD TITLE VI / NONDISCRIMINATION ASSURANCES

DOT Order No. 1050.2A

The *Northwest Piedmont 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:
 

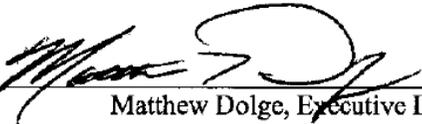
"The *Northwest Piedmont Rural Planning Organization*, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant 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.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, the *Northwest Piedmont 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 *Northwest Piedmont 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 5/29/18

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

### (HABENDUM CLAUSE)

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

The *NCDOT*, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]\* (2) that the *NCDOT* will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, 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 *North Carolina Department of Transportation (NCDOT)* pursuant to the provisions of Assurance 7(a):

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

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

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

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

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

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

## APPENDIX E

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 and TCC Members and Responsibilities**

**TAC as of June 2018**

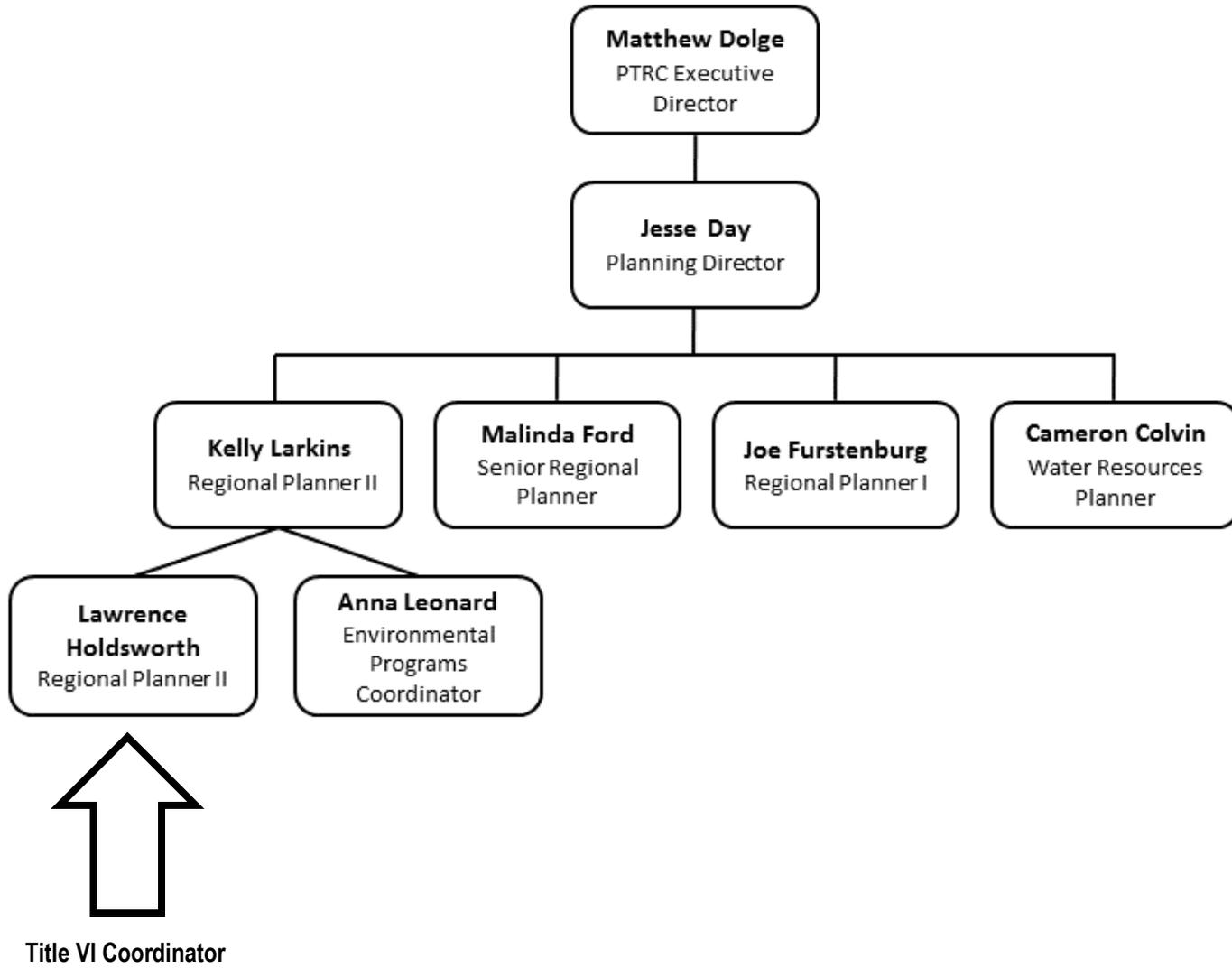
<b>Name</b>	<b>Affiliation</b>	<b>Gender</b>	<b>Race</b>
<b>Voting Members</b>			
Benita Finney	Davie County	W	W
Rick Morris	Stokes County	M	W
Van Tucker	Surry County	M	W
Steve Yokeley	City of Mount Airy	M	W
Jim Armbrister (Alternate)	City of Mount Airy	M	W
Kevin Austin (Chair)	Yadkin County	M	W
Wayne Moore	Town of Jonesville	M	W
Charles Byron	Town of Walnut Cove	M	B
Brent Ward	Town of Mocksville	M	W
George Burns	Town of East Bend	M	W
Robin Testerman	Town of Dobson	F	W
Vaughn Benton	Town of Boonville	M	W
Steve Shelton	Town of Danbury	M	W
Monta Davis-Oliver	Town of Yadkinville	F	W
Tommy Wheeler	Town of Elkin	M	W
Scott Needham	Town Pilot Mountain	M	W
Cullie Tarleton	NCDOT Board of Transportation	M	W
<b>Non-Voting Members</b>			
Lawrence Holdsworth	NWPRPO Secretary/PTRC	M	W
Jesse Day	PTRC	M	W
Byron Brown	W-S MPO	M	B
John Rhyne	NCDOT Division 9	M	W
Pat Ivey	NCDOT Division 9	M	W
Phillip Craver	NCDOT Division 9	M	W
Rob Weisz	NCDOT Division 11		
Mike Pettyjohn	NCDOT Division 11	M	W
Reuben Crummy	NCDOT RPO Coordinator	M	B

**TCC as of June 2018**

<b>Name</b>	<b>Affiliation</b>	<b>Gender</b>	<b>Race</b>
<b>Voting Members</b>			
<b>County</b>			
Andrew Meadwell	Davie County	M	W
Lisa Hughes	Yadkin County	F	W
Chris Knopf	Surry County	M	W
David Sudderth	Stokes County	M	W
<b>Municipal</b>			
Sarah Harris	Town of Elkin	M	W
Andy Goodall, Jr.	Benchmark Planning	M	W
Michael Boaz	Town of Pilot Mountain	M	W
Laura Neely	Town of Dobson	F	W
Michael Pardue	Town of Jonesville	M	W
Kim Wells	Town of Boonville	F	W
Vacant	Town of Walnut Cove		
Mike Barsness	Town of Danbury	M	W
Vacant	Town of Cooleemee		
Perry Williams	Town of Yadkinville		
Vacant	Town of Mocksville		
<b>Other</b>			
Lawrence Holdsworth	NWPRPO Secretary/PTRC	M	W
John Rhyne	NCDOT Division 9	M	W
Pat Ivey	NCDOT Division 9	M	W
Phillip Craver	NCDOT Division 9	M	W
Fred Haith	NCDOT Division 9	M	B
Mike Pettyjohn	NCDOT Division 11	M	W
Rob Weisz	NCDOT Division 11	M	W
Sean Sizemore	NCDOT Division 11	M	W
Reuben Crummy	NCDOT RPO Coordinator	M	B
Kyle Laird	PART	M	W
Jeff Cockerham	YVEDDI	M	W
<b>Alternate</b>			
Dawn Vallieres	Yadkin County	F	W
Brent Cornelison	Town of Elkin	M	W
Mark Kirstner	PART	M	W
Amy Litz	Davie County	F	W
Kim Bates	Surry County	M	W
Kevin Edwards	YVEDDI	M	W

<b>Non-Voting Representatives</b>			
Byron Brown	W-S MPO	M	B
Jesse Day	PTRC	M	W

**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:

Davie County		
Race and Ethnicity	Number	Percent
Total population	41,240	100
One race	40,545	98.3
White	36,100	87.5
Black or African American	2,593	6.3
American Indian and Alaska Native	149	0.4
Asian	239	0.6
Native Hawaiian and Other Pacific Islander	6	0
Some Other Race	1458	3.5
<b>HISPANIC OR LATINO</b>		
Total population	41240	100
Hispanic or Latino (of any race)	2496	6.1
Mexican	1653	4
Puerto Rican	109	0.3
Cuban	20	0
Other Hispanic or Latino	714	1.7

Stokes County		
RACE	Number	Percent
Total population	47,401	100
One race	46,814	98.8
White	44,021	92.9
Black or African American	1,916	4
American Indian and Alaska Native	156	0.3
Asian	125	0.3
Native Hawaiian and Other Pacific Islander	7	0
Some Other Race	589	1.2
Two or More Races	587	1.2
<b>HISPANIC OR LATINO</b>		
Total population	47401	100
Hispanic or Latino (of any race)	1254	2.6
Mexican	845	1.8
Puerto Rican	143	0.3
Cuban	34	0.1
Other Hispanic or Latino [2]	232	0.5

Surry County		
Race and Ethnicity	Number	Percent
Total population	73,673	100
One race	72,669	98.6
White	64,926	88.1
Black or African American	2,749	3.7
American Indian and Alaska Native	219	0.3
American Indian or Alaska Native, not specified	79	0.1
Asian	347	0.5
Native Hawaiian and Other Pacific Islander	18	0
Some Other Race	4410	6
Two or More Races	1004	1.4
<b>HISPANIC OR LATINO</b>		
Total population	73673	100
Hispanic or Latino (of any race)	7155	9.7
Mexican	6323	8.6
Puerto Rican	132	0.2
Cuban	51	0.1
Other Hispanic or Latino [2]	649	0.9

Yadkin County		
Race and Ethnicity	Number	Percent
Total population	38,406	100
One race	37,928	98.8
White	34,007	88.5
Black or African American	1,192	3.1
American Indian and Alaska Native	79	0.2
Asian	78	0.2
Native Hawaiian and Other Pacific Islander	12	0
Some Other Race	2560	6.7
Two or More Races	478	1.2
<b>HISPANIC OR LATINO</b>		
Total population	38406	100
Hispanic or Latino (of any race)	3749	9.8
Mexican	3319	8.6
Puerto Rican	57	0.1
Cuban	15	0
Other Hispanic or Latino [2]	358	0.9

### Age and Sex

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

Davie County							
Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
Total population	41,240	20,136	21,104	100	100	100	95.4
Under 5 years	2,352	1,252	1,100	5.7	6.2	5.2	113.8
Under 18 years	9,751	5,050	4,701	23.6	25.1	22.3	107.4
18 to 64 years	24,660	12,111	12,549	59.8	60.1	59.5	96.5
65 years and over	6,829	2,975	3,854	16.6	14.8	18.3	77.2
Median age (years)	42.5	41.4	43.5	( X )	( X )	( X )	( X )

Stokes County							
Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
Total population	47,401	23,124	24,277	100	100	100	95.3
Under 5 years	2,496	1,300	1,196	5.3	5.6	4.9	108.7
Under 18 years	10,521	5,365	5,156	22.2	23.2	21.2	104.1
18 to 64 years	29,305	14,528	14,777	61.8	62.8	60.9	98.3
65 years and over	7,575	3,231	4,344	16	14	17.9	74.4
Median age (years)	42.8	41.7	43.8	( X )	( X )	( X )	( X )

Surry County							
Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
Total population	73,673	35,971	37,702	100	100	100	95.4
Under 5 years	4,375	2,213	2,162	5.9	6.2	5.7	102.4
Under 18 years	17,217	8,827	8,390	23.4	24.5	22.3	105.2
18 to 64 years	44,206	22,068	22,138	60	61.3	58.7	99.7
65 years and over	12,250	5,076	7,174	16.6	14.1	19	70.8
Median age (years)	41.2	39.7	42.8	( X )	( X )	( X )	( X )

Yadkin County							
Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
Total population	38,406	18,877	19,529	100	100	100	96.7
Under 5 years	2,283	1,174	1,109	5.9	6.2	5.7	105.9
Under 18 years	8,938	4,656	4,282	23.3	24.7	21.9	108.7
18 to 64 years	23,227	11,534	11,693	60.5	61.1	59.9	98.6
65 years and over	6,241	2,687	3,554	16.3	14.2	18.2	75.6
Median age (years)	41.4	40.3	42.5	( X )	( X )	( X )	( X )

## Disability

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

Davie 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	41,188	117	5,708	570	13.9%	1.4
<b>SEX</b>						
Male	20,071	169	2,604	344	13.0%	1.7
Female	21,117	167	3,104	383	14.7%	1.8
<b>RACE AND HISPANIC OR LATINO ORIGIN</b>						
White alone	36,531	398	5,343	568	14.6%	1.6
Black or African American alone	2,578	185	283	113	11.0%	4.5
American Indian and Alaska Native alone	19	30	10	19	52.6%	49.9
Asian alone	318	48	25	38	7.9%	11.5
Native Hawaiian and Other Pacific Islander alone	0	25	0	25	-	**
Some other race alone	1,124	381	35	47	3.1%	4.2
Two or more races	618	189	12	16	1.9%	2.7
White alone, not Hispanic or Latino	34,979	150	5,241	568	15.0%	1.6
Hispanic or Latino (of any race)	2,667	25	137	104	5.1%	3.9
<b>AGE</b>						
Under 5 years	2,154	142	76	83	3.5%	3.9
5 to 17 years	7,039	138	433	160	6.2%	2.3
18 to 34 years	6,603	180	392	169	5.9%	2.6
35 to 64 years	17,783	219	2,287	426	12.9%	2.4
65 to 74 years	4,355	105	1,036	170	23.8%	3.8
75 years and over	3,254	99	1,484	200	45.6%	5.9

Stokes 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	46,011	129	7,106	593	15.4%	1.3
<b>SEX</b>						
Male	22,595	119	3,400	385	15.0%	1.7
Female	23,416	149	3,706	391	15.8%	1.7
<b>RACE AND HISPANIC OR LATINO ORIGIN</b>						
White alone	43,012	250	6,615	589	15.4%	1.4
Black or African American alone	1,872	135	327	121	17.5%	6.1
American Indian and Alaska Native alone	271	112	37	47	13.7%	17.9
Asian alone	139	44	0	25	0.0%	20.7
Native Hawaiian and Other Pacific Islander alone	15	31	7	15	46.7%	32.5
Some other race alone	217	107	76	62	35.0%	18.3
Two or more races	485	178	44	49	9.1%	8.6
White alone, not Hispanic or Latino	42,114	132	6,522	567	15.5%	1.3
Hispanic or Latino (of any race)	1,295	8	183	74	14.1%	5.7
<b>AGE</b>						
Under 5 years	2,191	53	0	25	0.0%	1.5
5 to 17 years	7,169	104	310	116	4.3%	1.6
18 to 34 years	8,077	177	561	189	6.9%	2.3
35 to 64 years	20,116	190	3,104	369	15.4%	1.8

65 to 74 years	5,127	105	1479	269	28.8%	5.2
75 years and over	3,331	121	1,652	203	49.6%	5.7

Surry 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	71,976	169	14,272	684	19.8%	0.9
<b>SEX</b>						
Male	35,081	144	7,375	453	21.0%	1.3
Female	36,895	154	6,897	406	18.7%	1.1
<b>RACE AND HISPANIC OR LATINO ORIGIN</b>						
White alone	66,302	456	13,265	607	20.0%	0.9
Black or African American alone	2,568	171	690	123	26.9%	4.8
American Indian and Alaska Native alone	276	97	56	35	20.3%	13.3
Asian alone	436	52	5	10	1.1%	2.3
Native Hawaiian and Other Pacific Islander alone	47	40	16	25	34.0%	43.2
Some other race alone	1189	374	65	75	5.5%	5.5
Two or more races	1158	333	175	97	15.1%	7.4
White alone, not Hispanic or Latino	60,957	158	12,845	605	21.1%	1
Hispanic or Latino (of any race)	7221	3	612	180	8.5%	2.5
<b>AGE</b>						
Under 5 years	3,899	43	129	68	3.3%	1.8
5 to 17 years	12,188	44	898	194	7.4%	1.6
18 to 34 years	13,137	99	1195	255	9.1%	2
35 to 64 years	29,549	124	6,368	448	21.6%	1.5
65 to 74 years	7,725	78	2510	232	32.5%	3
75 years and over	5,478	167	3,172	204	57.9%	3.3

Yadkin 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	37,547	130	6,381	606	17.0%	1.6
<b>SEX</b>						
Male	18,498	140	3,159	362	17.1%	2
Female	19,049	155	3,222	421	16.9%	2.2
<b>RACE AND HISPANIC OR LATINO ORIGIN</b>						
White alone	34,361	583	5,957	603	17.3%	1.8
Black or African American alone	1,264	106	333	82	26.3%	6.3
American Indian and Alaska Native alone	111	63	3	5	2.7%	5.6
Asian alone	22	23	0	25	0.0%	63.2
Native Hawaiian and Other Pacific Islander alone	0	25	0	25	-	**
Some other race alone	1222	620	29	43	2.4%	3.3
Two or more races	567	216	59	43	10.4%	6.9
White alone, not Hispanic or Latino	31,860	125	5,807	594	18.2%	1.8
Hispanic or Latino (of any race)	4003	14	179	111	4.5%	2.8
<b>AGE</b>						
Under 5 years	2,019	53	16	26	0.8%	1.3
5 to 17 years	6,280	41	394	156	6.3%	2.5

18 to 34 years	6,881	208	565	200	8.2%	3
35 to 64 years	15,692	214	2,623	346	16.7%	2.2
65 to 74 years	3,961	46	1203	217	30.4%	5.4
75 years and over	2,714	118	1,580	189	58.2%	6.1

### Poverty

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

Davie 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	41,186	125	5,735	981	13.9%	2.4
<b>AGE</b>						
Under 18 years	9,153	97	2,085	555	22.8%	6.1
Related children of householder under 18 years	9,103	113	2,045	554	22.5%	6.1
18 to 64 years	24,424	136	3,048	538	12.5%	2.2
65 years and over	7,609	114	602	164	7.9%	2.1
<b>SEX</b>						
Male	20,109	168	2,785	535	13.8%	2.7
Female	21,077	170	2,950	517	14.0%	2.5
<b>RACE AND HISPANIC OR LATINO ORIGIN</b>						
White alone	36,560	399	4,992	965	13.7%	2.6
Black or African American alone	2,578	185	391	169	15.2%	6.2
American Indian and Alaska Native alone	19	30	10	19	52.6%	49.9
Asian alone	318	48	0	25	0.0%	10
Native Hawaiian and Other Pacific Islander alone	0	25	0	25	-	**
Some other race alone	1,093	378	116	114	10.6%	11
Two or more races	618	189	226	113	36.6%	16
Hispanic or Latino origin (of any race)	2,667	25	755	422	28.3%	16
White alone, not Hispanic or Latino	35,008	147	4,363	916	12.5%	3
<b>All Individuals below:</b>						
50 percent of poverty level	1,972	565	(X)	(X)	(X)	(X)
125 percent of poverty level	7,086	948	(X)	(X)	(X)	(X)
150 percent of poverty level	8,875	954	(X)	(X)	(X)	(X)
185 percent of poverty level	11,514	994	(X)	(X)	(X)	(X)
200 percent of poverty level	12,504	978	(X)	(X)	(X)	(X)
300 percent of poverty level	21,413	1,148	(X)	(X)	(X)	(X)
400 percent of poverty level	27,897	1,147	(X)	(X)	(X)	(X)
500 percent of poverty level	31,303	996	(X)	(X)	(X)	(X)

Stokes 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	45,853	171	7,052	943	15.4%	2
<b>AGE</b>						
Under 18 years	9,202	132	1,979	421	21.5%	4.6
Related children of householder under 18 years	9,153	118	1,930	435	21.1%	4.7
18 to 64 years	28,193	149	4,142	590	14.7%	2.1
65 years and over	8,458	127	931	276	11.0%	3.2
<b>SEX</b>						
Male	22,523	138	3,178	544	14.1%	2.4
Female	23,330	164	3,874	518	16.6%	2.2
<b>RACE AND HISPANIC OR LATINO ORIGIN</b>						
White alone	42,872	272	6,476	928	15.1%	2.1
Black or African American alone	1,872	135	366	155	19.6%	8.5
American Indian and Alaska Native alone	271	112	54	41	19.9%	15.8
Asian alone	139	44	0	25	0.0%	21
Native Hawaiian and Other Pacific Islander alone	15	31	0	25	0.0%	77
Some other race alone	217	107	33	52	15.2%	27
Two or more races	467	176	123	68	26.3%	16
Hispanic or Latino origin (of any race)	1,295	8	581	173	44.9%	13
White alone, not Hispanic or Latino	41,974	176	5,941	913	14.2%	2
<b>All Individuals below:</b>						
50 percent of poverty level	2,753	678	(X)	(X)	(X)	(X)
125 percent of poverty level	9,518	1,092	(X)	(X)	(X)	(X)
150 percent of poverty level	12,133	1,198	(X)	(X)	(X)	(X)
185 percent of poverty level	15,467	1,206	(X)	(X)	(X)	(X)
200 percent of poverty level	17,057	1,243	(X)	(X)	(X)	(X)
300 percent of poverty level	27,966	1,062	(X)	(X)	(X)	(X)
400 percent of poverty level	34,576	909	(X)	(X)	(X)	(X)
500 percent of poverty level	39,133	775	(X)	(X)	(X)	(X)

Surry 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	71,711	248	12,801	954	17.9%	1.3
<b>AGE</b>						
Under 18 years	15,804	173	3,792	494	24.0%	3
Related children of householder under 18 years	15,715	211	3,727	498	23.7%	3.1
18 to 64 years	42,704	115	7,311	634	17.1%	1.5
65 years and over	13,203	180	1,698	263	12.9%	1.9
<b>SEX</b>						
Male	34,951	192	5,872	511	16.8%	1.5
Female	36,760	182	6,929	582	18.8%	1.6
<b>RACE AND HISPANIC OR LATINO ORIGIN</b>						

White alone	66,061	467	11,034	961	16.7%	1.4
Black or African American alone	2,555	175	860	233	33.7%	8.8
American Indian and Alaska Native alone	267	96	52	30	19.5%	12.8
Asian alone	436	52	51	53	11.7%	12
Native Hawaiian and Other Pacific Islander alone	47	40	16	25	34.0%	43
Some other race alone	1,189	374	542	285	45.6%	16
Two or more races	1,156	333	246	140	21.3%	12
Hispanic or Latino origin (of any race)	7,204	20	2,495	477	34.6%	7
White alone, not Hispanic or Latino	60,733	232	9,240	853	15.2%	1
All Individuals below:						
50 percent of poverty level	5,584	733	(X)	(X)	(X)	(X)
125 percent of poverty level	18,484	1,120	(X)	(X)	(X)	(X)
150 percent of poverty level	24,058	1,227	(X)	(X)	(X)	(X)
185 percent of poverty level	30,145	1,204	(X)	(X)	(X)	(X)
200 percent of poverty level	32,313	1,258	(X)	(X)	(X)	(X)
300 percent of poverty level	46,966	1,191	(X)	(X)	(X)	(X)
400 percent of poverty level	55,503	947	(X)	(X)	(X)	(X)
500 percent of poverty level	61,823	896	(X)	(X)	(X)	(X)

Yadkin 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	37,484	119	7,112	1,021	19.0%	2.7
AGE						
Under 18 years	8,236	78	2,436	480	29.6%	5.9
Related children of householder under 18 years	8,197	96	2,410	480	29.4%	5.9
18 to 64 years	22,573	68	3,848	573	17.0%	2.5
65 years and over	6,675	125	828	196	12.4%	2.9
SEX						
Male	18,455	146	3,349	561	18.1%	3
Female	19,029	149	3,763	568	19.8%	3
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	34,298	587	5,794	909	16.9%	2.6
Black or African American alone	1,264	106	295	140	23.3%	10.5
American Indian and Alaska Native alone	111	63	36	40	32.4%	37.8
Asian alone	22	23	18	21	81.8%	29
Native Hawaiian and Other Pacific Islander alone	0	25	0	25	-	**
Some other race alone	1,222	620	648	560	53.0%	28
Two or more races	567	216	321	223	56.6%	27
Hispanic or Latino origin (of any race)	4,003	14	1,476	479	36.9%	12

White alone, not Hispanic or Latino	31,797	113	5,143	810	16.2%	3
All Individuals below:						
50 percent of poverty level	2,984	784	(X)	(X)	(X)	(X)
125 percent of poverty level	9,496	1,111	(X)	(X)	(X)	(X)
150 percent of poverty level	12,132	1,251	(X)	(X)	(X)	(X)
185 percent of poverty level	15,918	1,203	(X)	(X)	(X)	(X)
200 percent of poverty level	16,939	1,198	(X)	(X)	(X)	(X)
300 percent of poverty level	24,350	1,041	(X)	(X)	(X)	(X)
400 percent of poverty level	29,048	879	(X)	(X)	(X)	(X)
500 percent of poverty level	32,525	734	(X)	(X)	(X)	(X)

### Household Income

The following table was completed using data from Census Table S1901, Income in the Past 12 Months:

Davie County		
	Households	
Subject	Estimate	Margin of Error
Total	15,646	423
Less than \$10,000	4.90%	1.3
\$10,000 to \$14,999	6.1%	1.2
\$15,000 to \$24,999	12.0%	1.9
\$25,000 to \$34,999	9.3%	1.4
\$35,000 to \$49,999	16.2%	2
\$50,000 to \$74,999	18.8%	2.3
\$75,000 to \$99,999	12.90%	1.7
\$100,000 to \$149,999	9.7%	1.8
\$150,000 to \$199,999	4.8%	1.1
\$200,000 or more	5.3%	1.3
Median income (dollars)	\$ 51,662	\$ 2,320
Mean income (dollars)	\$ 71,900	\$ 4,058

Stokes County		
	Households	
Subject	Estimate	Margin of Error
Total	19,190	350
Less than \$10,000	7.40%	1.6
\$10,000 to \$14,999	8.5%	1.5
\$15,000 to \$24,999	13.3%	1.9
\$25,000 to \$34,999	11.4%	1.7
\$35,000 to \$49,999	17.7%	2.1
\$50,000 to \$74,999	17.9%	2.3
\$75,000 to \$99,999	13.80%	1.9
\$100,000 to \$149,999	7.0%	1.2
\$150,000 to \$199,999	2.4%	0.8
\$200,000 or more	0.7%	0.3
Median income (dollars)	\$ 42,489	\$ 1,716

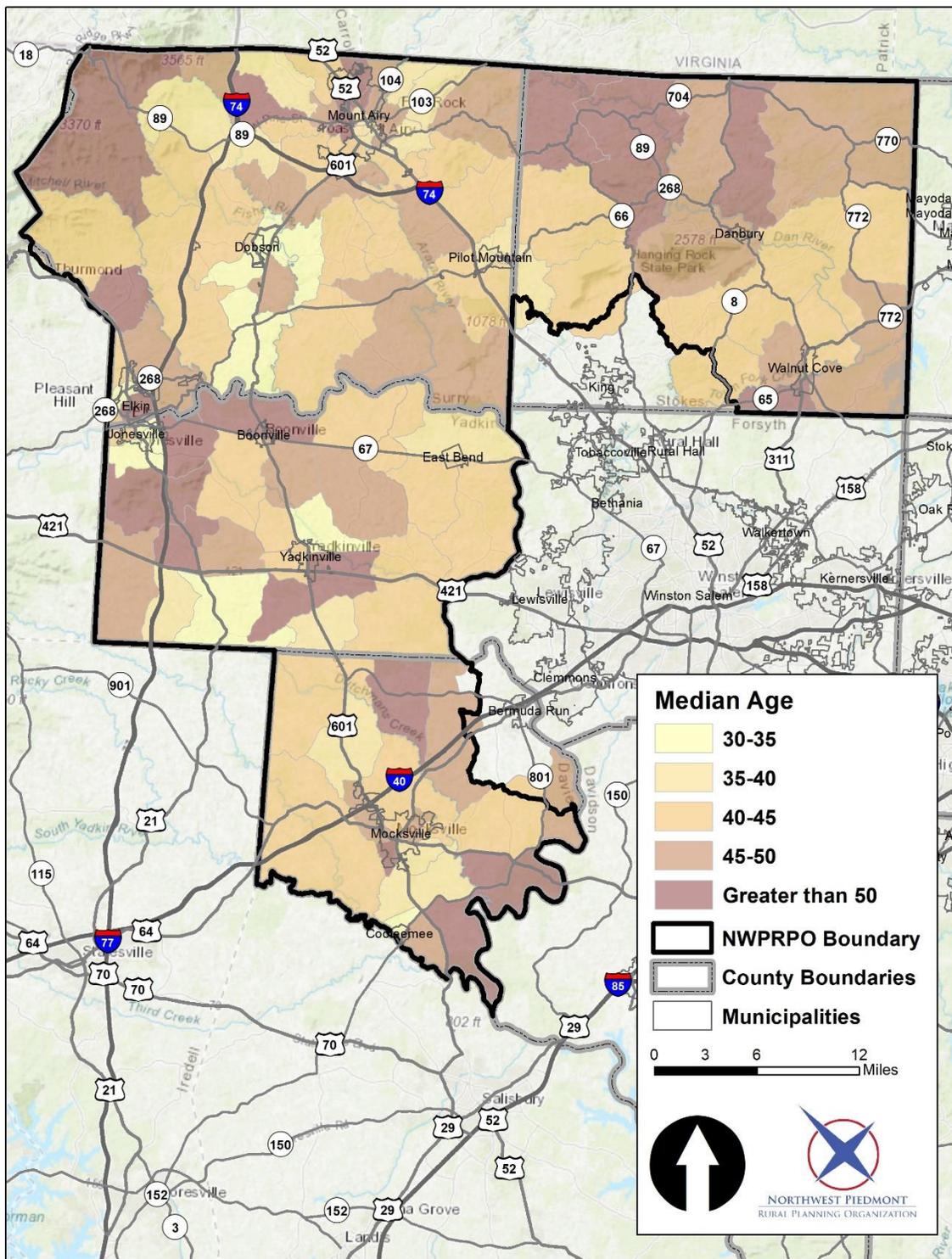
Mean income (dollars)	\$ 52,064	\$ 2,326
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Surry County		
	Households	
Subject	Estimate	Margin of Error
Total	28,837	462
Less than \$10,000	9.70%	1.1
\$10,000 to \$14,999	7.8%	0.9
\$15,000 to \$24,999	14.6%	1.2
\$25,000 to \$34,999	15.0%	1.1
\$35,000 to \$49,999	15.1%	1.3
\$50,000 to \$74,999	16.3%	1.2
\$75,000 to \$99,999	9.70%	0.9
\$100,000 to \$149,999	8.5%	0.9
\$150,000 to \$199,999	1.5%	0.5
\$200,000 or more	2.0%	0.4
Median income (dollars)	\$ 37,345	\$ 1,192
Mean income (dollars)	\$ 53,019	\$ 1,743

Yadkin County		
	Households	
Subject	Estimate	Margin of Error
Total	15,287	319
Less than \$10,000	9.20%	1.8
\$10,000 to \$14,999	6.9%	1.5
\$15,000 to \$24,999	14.5%	2
\$25,000 to \$34,999	14.9%	1.9
\$35,000 to \$49,999	15.5%	2
\$50,000 to \$74,999	18.3%	2.1
\$75,000 to \$99,999	9.80%	1.4
\$100,000 to \$149,999	7.6%	1.3
\$150,000 to \$199,999	1.7%	0.5
\$200,000 or more	1.6%	0.6
Median income (dollars)	\$ 38,623	\$ 3,433
Mean income (dollars)	\$ 52,448	\$ 3,254

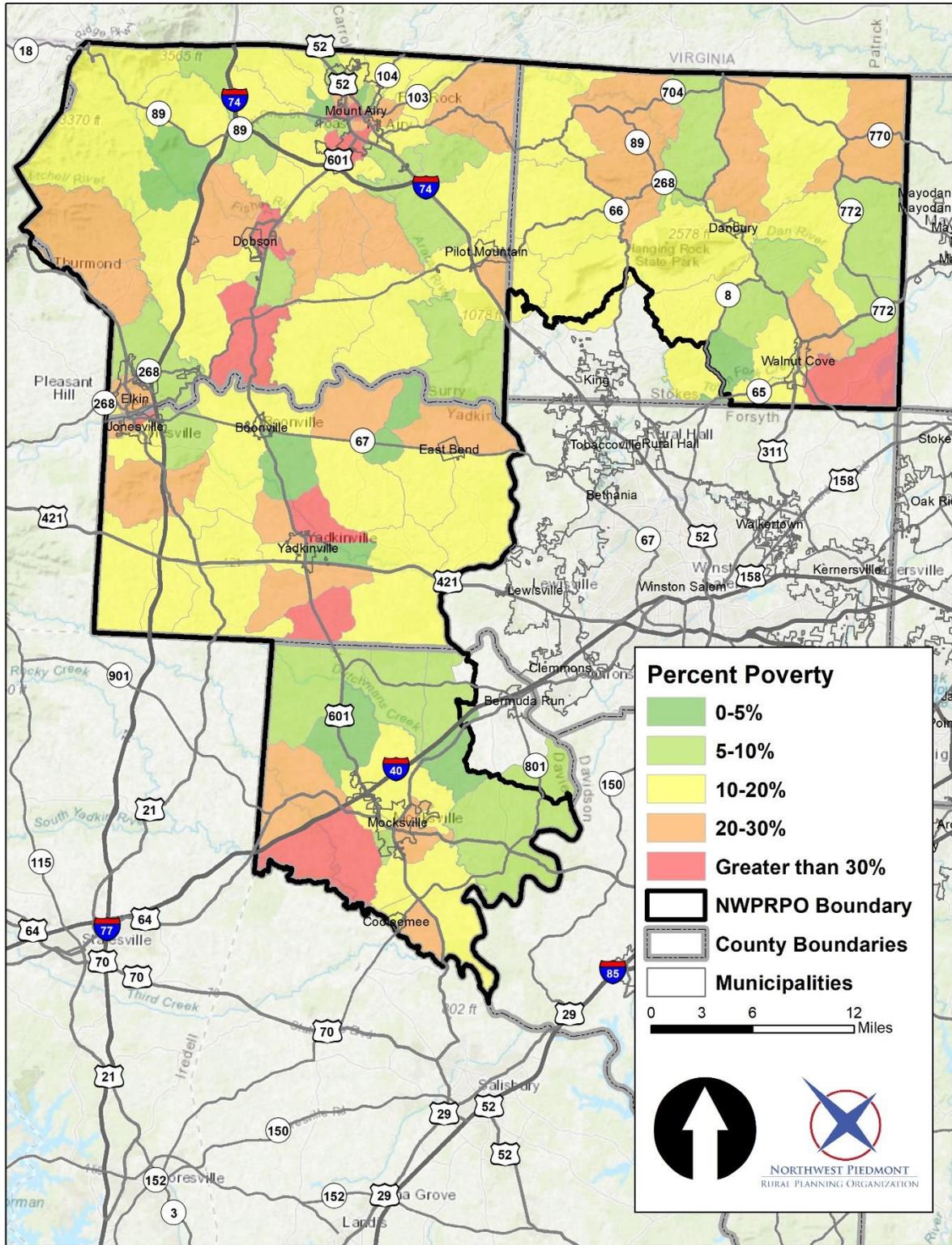
## Appendix E Demographic Maps (EJ)

### Median Age By Census Block Group ACS 2016



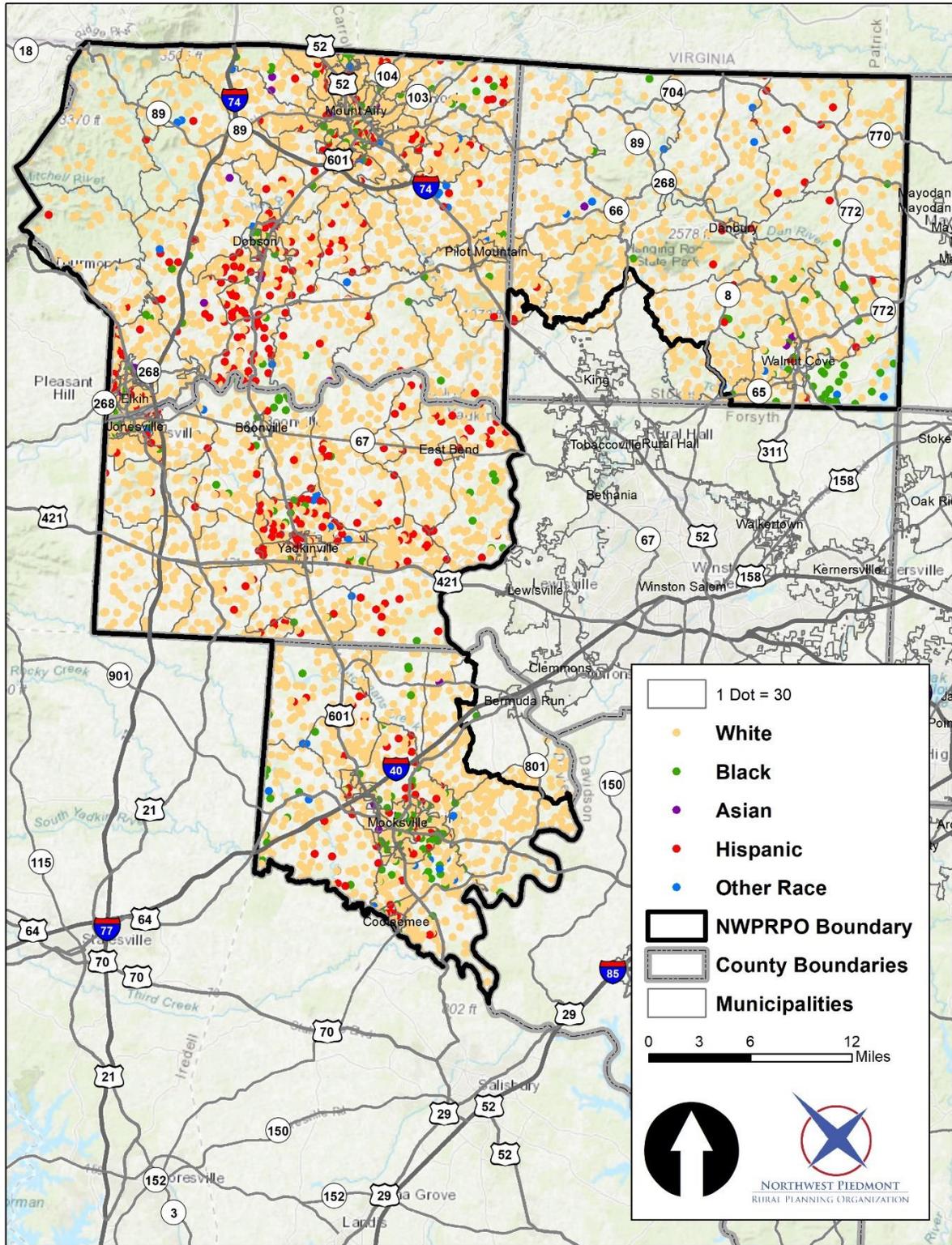


Poverty Rate By Census Block Group ACS 2016

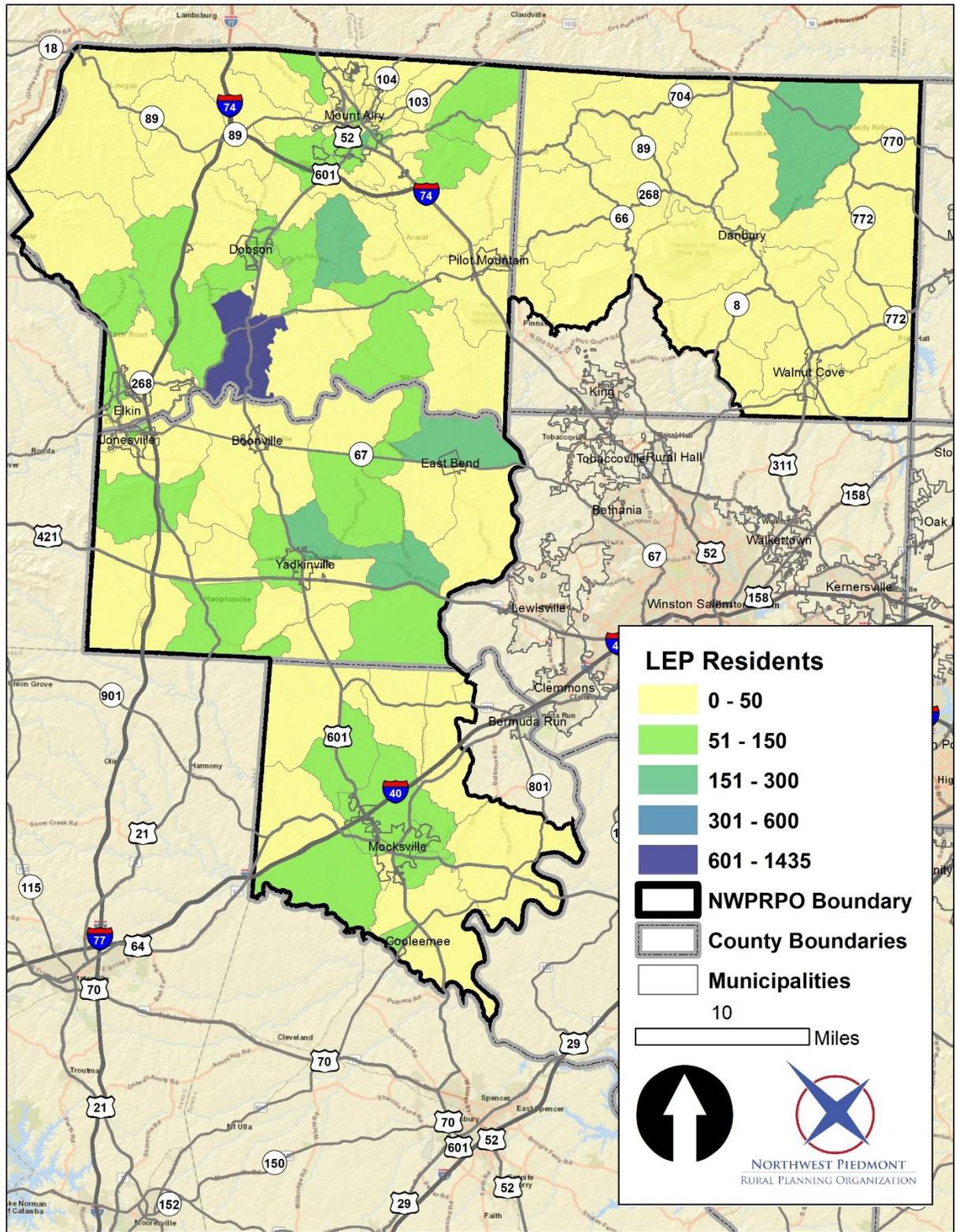




# Race and Ethnicity by Census Block Group ACS 2016



**Spanish Speakers with Limited English Proficiency by Census Block Group ACS 2016**



**Appendix F**  
**Investigation Guidance, Discrimination Complaint Form and Log**  
**INVESTIGATIVE GUIDANCE**

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

**Sample Investigative Report Template**

- I. COMPLAINANT(S) NAME** (or attorney for the complainant(s) – name and address if applicable)  
Name, Address, Phone: 999-999-9999
- II. RESPONDENT(S)** (or attorney for the respondent(s) – name and address if applicable)  
Name, Address, Phone: 999-999-9999
- III. APPLICABLE LAW/REGULATION**  
[For example, Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d); 49 CFR §21.11; 49 CFR §26.53]
- IV. COMPLAINT BASIS/(ES)**  
[For example, Race, Color, National Origin, Limited English Proficiency, Sex, Age, Disability)]
- V. ALLEGATIONS**  
[Describe in logical sequence, each allegation including the prohibited basis for the alleged discriminatory conduct, (e.g., race, color, national origin, sex, age, or disability) and the specific statutory or regulatory provision the allegation would violate, if proven to be true.]

Issue #1 – Complainant alleges that transit system failed to inform minority communities of rate increases.  
Issue #2 – Complainant alleges that transit system has not sufficiently publicized or held public meetings to share information regarding fare increases and route changes that impacts low-income and minority citizens.

**VI. BACKGROUND**

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

**VII. INVESTIGATIVE PROCEDURE**

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

**VIII. FINDINGS OF FACT**

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

**IX. CONCLUSION**

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

**X. RECOMMENDED ACTIONS**

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

**APPENDIX**

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

Northwest Piedmont Rural Planning Organization  
**DISCRIMINATION COMPLAINT FORM**

<p><b>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 Northwest Piedmont RPO within 180 days after the discrimination occurred.</b></p>				
Last Name:		First Name:		<input type="checkbox"/> Male <input type="checkbox"/> Female
Mailing Address:			City	State
Home Telephone:		Work Telephone:	E-mail Address	
Identify the Category of Discrimination: <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> AGE <input type="checkbox"/> 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. <b>(Attach additional page(s), if necessary).</b>				
The law prohibits intimidation or <b>retaliation</b> against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.				
Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: (Attached additional page(s), if necessary).				
	<u>Name</u>	<u>Address</u>	<u>Telephone</u>	
1.	_____	_____	_____	
2.	_____	_____	_____	
3.	_____	_____	_____	
4.	_____	_____	_____	

**DISCRIMINATION COMPLAINT FORM**

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

NC Department of Transportation \_\_\_\_\_  
 Federal Highway Administration \_\_\_\_\_  
 US Department of Transportation \_\_\_\_\_  
 Federal or State Court \_\_\_\_\_  
 Other \_\_\_\_\_

Have you discussed the complaint with any NWRPO 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.**

_____ <b>COMPLAINANT'S SIGNATURE</b>	_____ <b>DATE</b>
---	----------------------

**MAIL COMPLAINT FORM TO:**  
 Northwest Piedmont 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: \_\_\_\_\_



**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"/>