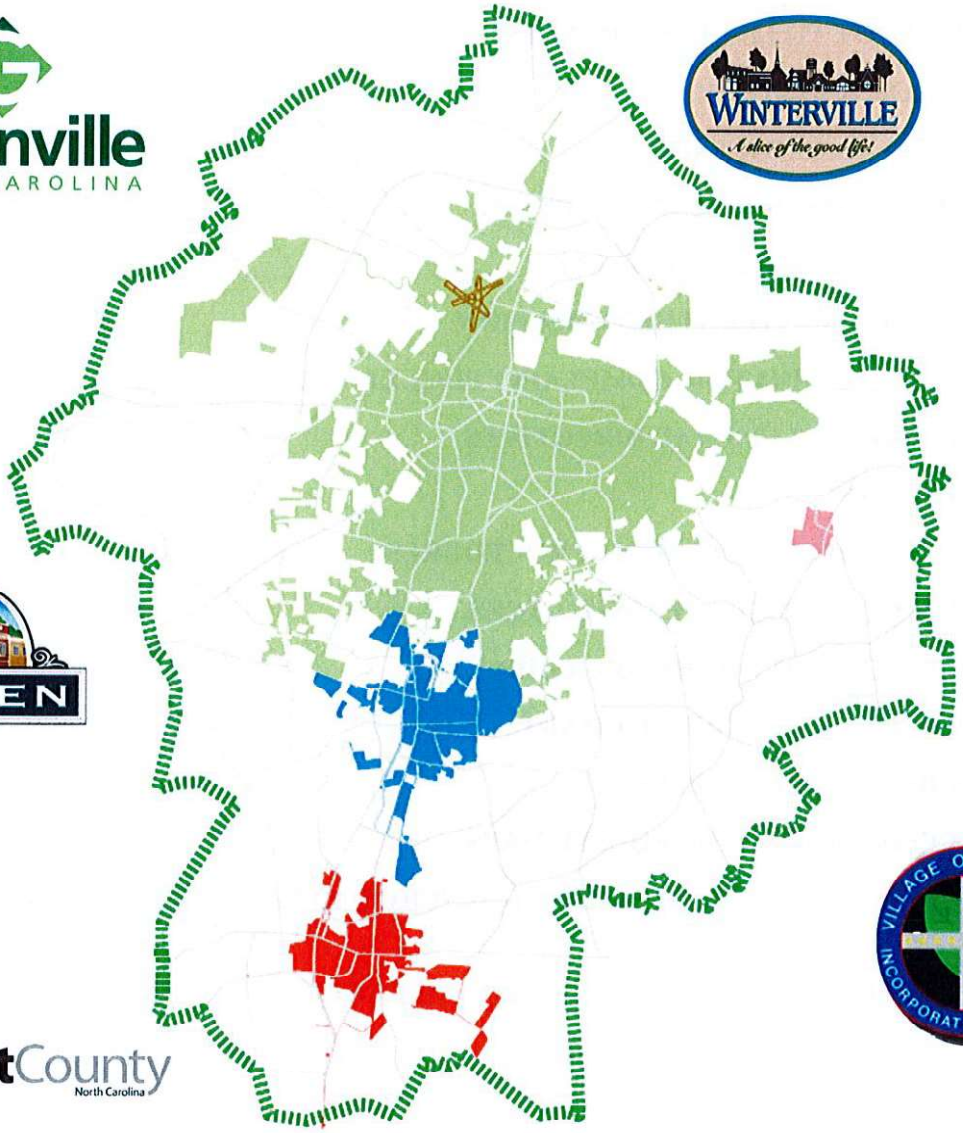
THE GREENVILLE URBAN AREA MPO
TITLE VI PROGRAM PLAN



Approved Greenville Urban Area
Metropolitan Planning Organization
May 1, 2019

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TITLE VI POLICY STATEMENT AND NOTICE OF NONDISCRIMINATION

It is the policy of Greenville Urban Area Metropolitan Planning Organization (GUAMPO), 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.

Ryan Purtle
1500 Beatty Street
252-329-4476
RPurtle@GreenvilleNC.gov

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

Ryan Purtle, Title VI Coordinator

May 14, 2019

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

STANDARD USDOT TITLE VI ASSURANCES

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

ORGANIZATION & STAFFING

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

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

The Greenville Urban Area Metropolitan Planning Organization was established in 1992 Our Transportation Advisory Committee (TAC) has seven (7) members, and meets quarterly (four scheduled meetings with any additional meetings scheduled as necessary). Our Technical Coordinating Committee (TCC) has twenty-four (24) members, and meets quarterly (four scheduled meetings with any additional meetings scheduled as necessary). Please refer to **Appendix B** for lists of current TAC and TCC members.

Title VI Coordinator

Key responsibilities of the Coordinator include:

- Maintaining knowledge of Title VI and related requirements.
- Attending civil rights training when offered by NCDOT, FHWA or other federal agencies.
- Administering the Title VI Nondiscrimination Program and coordinating implementation of this Plan.
- Making sure internal staff and officials are familiar and complying with their Title VI obligations.
- Disseminating Title VI information internally and to the public, including in languages other than English.
- Presenting Title VI-related information to decision-making bodies for input and approval.
- Ensuring Title VI-related posters are prominently and publicly displayed.
- Developing a process to collect data related to race, national origin, sex, age, and disability to ensure minority, low-income, and other underserved groups are included and not discriminated against.
- Ensuring that non-elected boards and committees reflect the service area and minorities are represented.
- Promptly processing (receiving, logging, investigating and/or forwarding) discrimination complaints.
- Providing information to NCDOT and cooperating during compliance reviews and investigations.
- Promptly resolving deficiencies to ensure compliance with Title VI nondiscrimination requirements.

If the 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

The Greenville MPO utilizes a staff of one (1), as shown in APPENDIX C, Transportation Planner, who serves as the MPO Coordinator with responsibilities include management of all MPO activities, including acting as the MPO's Title VI Coordinator.

An organizational chart showing the Transportation Planner/MPO Coordinator/Title VI Coordinator's place within the City of Greenville organization (MPO currently employs one staff who is responsible for all MPO activities) is located in **Appendix C (reference "GUAMPO, Transportation Planner")**.

ENVIRONMENTAL JUSTICE (EJ)

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

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

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

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

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

(5) Adding an EJ section to plans and studies, such as Long Range Plans, Public Involvement Plans, and Corridor Studies.

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

DATA COLLECTION/ANALYSIS/REPORTING

Data collection, analysis and reporting are key elements of a successful Title VI enforcement strategy. To ensure that Title VI reporting requirements are met, The Greenville Urban Area Metropolitan Planning Organization will collect and maintain data on potential and actual beneficiaries of our programs and services. This section contains relevant population data for our overall service area. The data provides context for the Title VI Nondiscrimination Program and will be used to ensure nondiscrimination in public outreach and delivery of our programs. Please refer to **Appendix D** for demographic tables on Race & Ethnicity, Age & Sex, Disability, Poverty, and Household Income.

Population Locations

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

LIMITED ENGLISH PROFICIENCY (LEP)

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

To comply with USDOT's LEP Policy Guidance and Executive Order 13166, this section of our Title VI Plan outlines the steps the Greenville Urban Area Metropolitan Planning Organization (GUAMPO) 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.***

LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
Total:	**209,416**	**54**	**100%**	0.026%
Speak only English	194,774	1155	93.01%	0.593%
Spanish:	10,248	826	4.89%	0.048%
Speak English "very well"	6,231	746	2.98%	11.972%
Speak English less than "very well"	4,017	572	1.918%	14.239%
Arabic:	453	429	0.216%	94.702%
Speak English "very well"	342	314	0.163%	91.813%
Speak English less than "very well"	111	120	0.053%	108.108%
Chinese (incl. Mandarin, Cantonese):	491	293	0.234%	59.674%
Speak English "very well"	198	148	0.095%	74.747%
Speak English less than "very well"	293	202	0.140%	68.942%

Spanish is the only language that meets Safe Harbor threshold (5% or above 1,000 for those who speak English less than "very well") but the next two most spoken non-English languages are included for context purposes. As a note, the margin of area on Arabic and Chinese language groups is statistically significant. The above statistics reflect the Greenville-Washington Combined Statistical Area, for information regarding additional language groups please refer to page XX in Appendix E for the full data set table. As Spanish is a common language in our region the City of Greenville employs individuals fluent in Spanish that are able to assist Limited English Proficient (LEP) Spanish speakers provide comments and feedback to the Greenville Urban Area Metropolitan Planning Organization. Based on the equity maps provided in Appendix E, it can be seen that the LEP population is more concentrated within the rural areas of the County, specifically in the rural area in the northwest and southeast corner of the Greenville Urbanized Area.

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

The small size of the LEP population in this region is not expected to increase disproportionately to the general population. However, to date, no requests have been made by either individuals or groups directly to the MPO for Spanish or other language interpreters or publications. Additionally no comments or public input has been received in any language other than English. Future requests for language assistance, or receive of public input in any language other than English will be monitored and used in future updates to this document and this Factor. The probability that Greenville Urban Area Metropolitan Planning Organization members will have future contact with LEP individuals is projected to remain similar to established patterns and occur very rarely.

The Greenville Urban Area Metropolitan Planning Organization conducts Technical Coordinating Committee (TCC) and Transportation Advisory Committee (TAC) meetings as needed throughout the year. Occasionally, the 16 MPO conducts open house public input workshops to receive input for regarding the Greenville Urban Area Metropolitan Planning Organization's prioritization list or for other projects, as they may occur. Community outreach is achieved through the Greenville Urban Area Metropolitan Planning Organization's website, in-person office visits to Greenville Urban Area Metropolitan Planning Organization staff, and though advertising in the local newspaper. The Greenville Urban Area Metropolitan Planning Organization will look for increased opportunities to advertise meetings and public involvement opportunities while also hosting public

meetings and/or workshops in areas containing a greater population of LEP citizens in an effort to increase involvement with the LEP community of the Greenville Urbanized Area.

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

The Greenville Urban Area Metropolitan Planning Organization's program uses federal funds to plan for future transportation projects, and therefore do not include any direct service or program that requires vital, immediate or emergency assistance, such as medical treatment or services for basic needs (like food or shelter). Further, the MPO does not conduct required activities such as applications, interviews or other activities prior to participation in its programs or events. Involvement by any citizen with the MPO or its committees is voluntary. However, the MPO must ensure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved in the transportation planning process to be consistent with the goal of the Federal Environmental Justice program and policy. The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process for the use of federal funds in three (3) major work products for the MPO (each of the following bullet points represents a document created by the Greenville Urban Area Metropolitan Planning Organization):

• The **Unified Planning Work Program (UPWP),** a one or two-year business plan outlining the Greenville Urban Area Metropolitan Planning Organization's planned activities and Federal expenditures.
• The **Transportation Improvement Program (TIP)**, a ten year (10) staged program of funded projects for all modes of travel. The TIP is based on and reflects the North Carolina Department of Transportation's Work Program and developed using the State's system of Prioritization that uses data to evaluate and fund the most important transportation projects across the State.
• The **Long Range Transportation Plan, (LRTP)**, also known as the Metropolitan Transportation Plan (MTP) is a twenty (20) year (or more) forecast of multi-modal transportation needs in the Greenville Urbanized Area that identifies policies, program and projects necessary to provide future safe and efficient travel in the Urban Area in the future and maintaining fiscal constraint.

The TIP document is developed by NCDOT. As such, any Spanish version of that document provided to the Greenville Urban Area Metropolitan Planning Organization by NCDOT will be made available on the MPO's website. Inclusive public participation is a priority consideration in other MPO plans, studies and programs as well. The impacts of transportation improvements resulting from these planning activities have an impact on all residents. Understanding and continued involvement are encouraged throughout the process. The Greenville Urban Area Metropolitan Planning Organization is concerned with input from all stakeholders, and every effort is taken to make the planning process as inclusive as possible.

As a result of the long range transportation planning process, selected projects receive approval for federal funding and progress towards project planning and construction under the responsibility of local jurisdictions or state transportation agencies. These state and local organizations have their own policies to ensure LEP individuals can participate in the process that shapes where, how and when a specific transportation project is implemented.

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

The Greenville Urban Area Metropolitan Planning Organization seeks input from all stakeholders, and every effort is made to ensure that the planning process is as inclusive as possible. Continued public involvement and participation is encouraged throughout the process. Given the small size of the LEP population within the Urban Area and financial constraints, full multi-language translations of large transportation plan documents, agenda packages, programs, and maps are not considered as warranted at this time. Moreover, based on the Greenville Urban Area Metropolitan Planning Organization's budget, the number of Greenville Urban Area Metropolitan Planning Organization staff, and rare occurrences MPO members encounter LEP persons, such activities would, at the present time, be cost prohibitive. However, as shown in the LEP Implementation Plan below, the

Greenville Urban Area Metropolitan Planning Organization will seek to include the LEP community and is committed to including all residents in the transportation planning and decision-making process.

The Greenville Urban Area Metropolitan Planning Organization will continue its efforts to collaborate with state and local agencies to provide language translation and interpretation services when practical and in consideration of the funding available. When applicable, the translation of these documents will begin after the final English version has been completed. Spanish language outreach materials from organizations such as federal, state, and local transportation agencies will be used when possible. Staff of the Greenville Urban Area Metropolitan Planning Organization will also offer additional meeting locations for use for planning activities that are located in area with a greater population of LEP citizens.

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 Spanish upon request.
- Vital documents—such as brochures with service times and routes—are translated into Spanish across the entire service area, and available in our facilities, and at other locations upon formal request.
- 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:
    - Holding small group meeting and/or workshops in areas of high LEP population.
    - Contacting LEP advocacy groups to identify key issues or opportunities for LEP population participation.
    - Increase dissemination of vital information to LEP community groups utilizing additional partner government agencies such as the Health Department and Housing Departments.

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

Project-Specific LEP Outreach

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

Monitoring and Updating the Language Assistance Plan

Monitoring of daily interactions with LEP persons will be continuous, thus language assistance techniques may be refined at any time. This Plan will be periodically reviewed—at least annually—to determine if our assistance measures and staff training are working. Resource availability and feedback from agency staff and the general public will be factors in the evaluation and any proposed updates. Among other practices, this process will include working with LEP community contacts to determine if our employees are responding appropriately to requests made with limited English or in languages other than English, and observing how agency staff responds to requests, including observing drivers or surveying riders. To the best of our ability, we will attempt to never eliminate a successful existing LEP service. Significant LEP program revisions will be approved or adopted by our board or designated official and dated accordingly. LEP data and procedures will be reviewed and updated at least once every three years.

DISSEMINATION OF TITLE VI INFORMATION

In accordance with 23 CFR 200.9(b)(12) and 49 CFR 21.9(d), the Greenville Urban Area Metropolitan 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:

  > "The Greenville Urban Area Metropolitan Planning Organization operates without regard to **race, color, national origin, limited English proficiency, sex, age or disability.** For more information on our Title VI program, or how to file a discrimination complaint, please contact 252-329-4476 or by email at RPurtle@greenvillenc.gov."
- 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: https://www.greenvillenc.gov/government/public-works/engineering/greenville-urban-area-metropolitan-planning-organization.

EXTERNAL DISCRIMINATION COMPLAINT PROCEDURES

These discrimination complaint procedures outline the process used by the Greenville Urban Area Metropolitan Planning Organization 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 Greenville Urban Area Metropolitan Planning Organization 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:

- **Greenville Urban Area Metropolitan Planning Organization,** Public Works Department-Engineering Division, 1500 Beatty Street, Greenville NC 27834; 252-329-4476; RPurtle@Greenvillenc.gov.
- **North Carolina Department of Transportation**, Office of Civil Rights, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or toll free 800-522-0453
- **Federal Highway Administration**, North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010
- **US Department of Transportation**, Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202-366-4070
- **US Department of Justice**, Special Litigation Section, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, DC 20530, 202-514-6255 or toll free 877-218-5228

4. **Format for Complaints** – Complaints shall be in **writing** and **signed** by the complainant(s) or a representative and include the complainant's name, address, and telephone number. Complaints received by fax or e-mail will be acknowledged and processed. Allegations received by telephone or in person will be reduced to writing, may be recorded and will be provided to the complainant for confirmation or revision before processing. Complaints will be accepted in other languages, including Braille.

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

Protected Categories	Definition	Examples	Applicable Statutes and Regulations
Race	An individual belonging to one of the accepted racial groups; or the perception, based usually on physical characteristics that a person is a member of a racial group	Black/African American, Hispanic/Latino, Asian, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, White	Title VI of the Civil Rights Act of 1964; 49 CFR Part 21; 23 CFR 200. *(Executive Order 13166)*
Color	Color of skin, including shade of skin within a racial group	Black, White, brown, yellow, etc.	
National Origin *(LEP)*	Place of birth. Citizenship is not a factor. Discrimination based on language or a person's accent is also covered.	Mexican, Cuban, Japanese, Vietnamese, Chinese	
Sex	Gender	Women and Men	1973 Federal-Aid Highway Act; Title IX of the Education Amendments of 1972.
Age	Persons of any age	21 year old person	Age Discrimination Act of 1975
Disability	Physical or mental impairment, permanent or temporary, or perceived.	Blind, alcoholic, para-amputee, epileptic, diabetic, arthritic	Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990

Complaint Processing

1. When a complaint is received, an Acknowledgment Letter and a Complainant Consent/Release Form will be mailed to the complainant within ten (10) business days by registered mail.
2. We will consult with the NCDOT Title VI Program to determine the acceptability and jurisdiction of all complaints received. (Note: If NCDOT will investigate, the Title VI Program will be responsible for the remainder of this process. We will record the transfer of responsibility in our complaints log).
3. Additional information will be requested if the complaint is incomplete. The complainant will be provided 15 business days to submit any requested information and the signed Consent Release form. Failure to do so may be considered good cause for a determination of no investigative merit.
4. Upon receipt of the requested information and determination of jurisdiction, we will notify the complainant and respondent of whether the complaint has sufficient merit to warrant investigation.

5. If the complaint is investigated, the notification shall state the grounds of our jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
6. If the complaint does not warrant investigation, the notification to the complainant shall specifically state the reason for the decision.

Complaint Log

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

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

REVIEW OF ORGANIZATIONAL DIRECTIVES

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

TITLE VI TRAINING

All employees will receive basic Title VI training at least once every three years. New hires will receive this training within 15 days of their start date. Basic training will cover all sections of this Plan and our overall Title VI obligations. Staff may receive specialized training on how Title VI applies to their specific work areas. Those who routinely encounter the public, such as office personnel, call center staff, and vehicle drivers, will receive annual refresher training. Trainings will be provided or organized by the Title VI Coordinator and will often coincide with updates to our nondiscrimination policies and procedures. Records of staff trainings, such as agendas, sign-in sheets, copies of calendars, and certificates, will remain on file for at least three years (and in personnel files).

COMPLIANCE AND ENFORCEMENT PROCEDURES

FHWA recipients must have mechanisms in place to enforce compliance with Title VI. The Greenville Urban Area Metropolitan 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, the Greenville Urban Area Metropolitan 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, The Greenville Metropolitan Planning Organization will take proactive steps to prevent discrimination in our programs and activities, including the following:

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

If the Greenville Urban Area Metropolitan 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: Greenville Urban Area Metropolitan Planning Organization's Title VI Assurances

STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

ROY COOPER
GOVERNOR

JAMES H. TROGDON, III
SECRETARY

United States Department of Transportation

STANDARD TITLE VI / NONDISCRIMINATION ASSURANCES

DOT Order No. 1050.2A

The North Carolina Department of Transportation (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

Mailing Address:
NC DEPARTMENT OF TRANSPORTATION
OFFICE OF CIVIL RIGHTS
1511 MAIL SERVICE CENTER
RALEIGH, NORTH CAROLINA 27699-1511

Telephone: (919) 508-1808
Fax: (919) 508-1814 / (919) 508-1818
Customer Service: 1-877-368-4968

Website: www.ncdot.gov

Location:
104 FAYETTEVILLE STREET
RALEIGH, NORTH CAROLINA 27601

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 North Carolina Department of Transportation, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 US.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 [redacted] 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 [redacted] 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 [redacted], 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.

Greenville Urban Area MPO

by_____

Mayor P.J. Connelly, Chair
Greenville Urban Area MPO Transportation Advisory Committee

DATED 10/10/2018

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

Greenville Urban Area Metropolitan Planning Organization

TRANSPORTATION ADVISORY COMMITTEE MEMBERS

CHAIR
P.J. Connelly, Mayor
City of Greenville
ALTERNATE: Rose Glover, Mayor Pro-Tem

Tom Coulson, Commissioner
Pitt County
ALTERNATE: Melvin C. McLawhorn

Steve Tripp, Mayor
Town of Ayden

Doug Jackson, Mayor
Town of Winterville
ALTERNATE: Tony Moore

VICE-CHAIR
Richard Zeck, Mayor
Village of Simpson

Thomas Taft Jr.
Board of Transportation
NCDOT

(non-voting)
John F. Sullivan III
Federal Highway Administration

Membership as of February 27, 2019

TECHNICAL COORDINATING COMMITTEE MEMBERS

Kevin Mulligan
Director of Public Works
City of Greenville
Chair

Thomas Barnett
Chief Planner
City of Greenville

Lamont Jackson
Transit Manager
City of Greenville

Scott P.M. Godefroy, P.E.
City Engineer
City of Greenville

Richard DiCesare, P.E., PTOE
City Traffic Engineer
City of Greenville

Ann E. Wall
City Manager
City of Greenville

James Rhodes, AICP
Planning Director
Pitt County

Jonas Hill
Planner
Pitt County

Ben Williams
Asst. Town Manager
Town of Winterville
Vice-Chair

Terri Parker
Town Manager
Town of Winterville

Steven Harrell
Town Manager
Town of Ayden

Stephen Smith
Community & Economic Planner
Town of Ayden

Richard Zeck
Mayor
Village of Simpson

Preston Hunter, PE
Division Engineer
Division 2, NCDOT

Steve Hamilton, PE
Division Traffic Engineer
Division 2, NCDOT

Michael Taylor
Assistant County Manager
Pitt Area Transit

Michelle Howes
Greenville MPO Coordinator
Transportation Planning Branch
NCDOT

Haywood Daughtry, PE, CPM
Eastern Region Mobility & Safety
Field Operations Engineer
NCDOT

Len White
Division Planning Engineer
Division 2, NCDOT

Kevin Richards
Planning Director
Mid-East Commission

William Bagnell
Associate Vice Chancellor
Campus Operations
East Carolina University

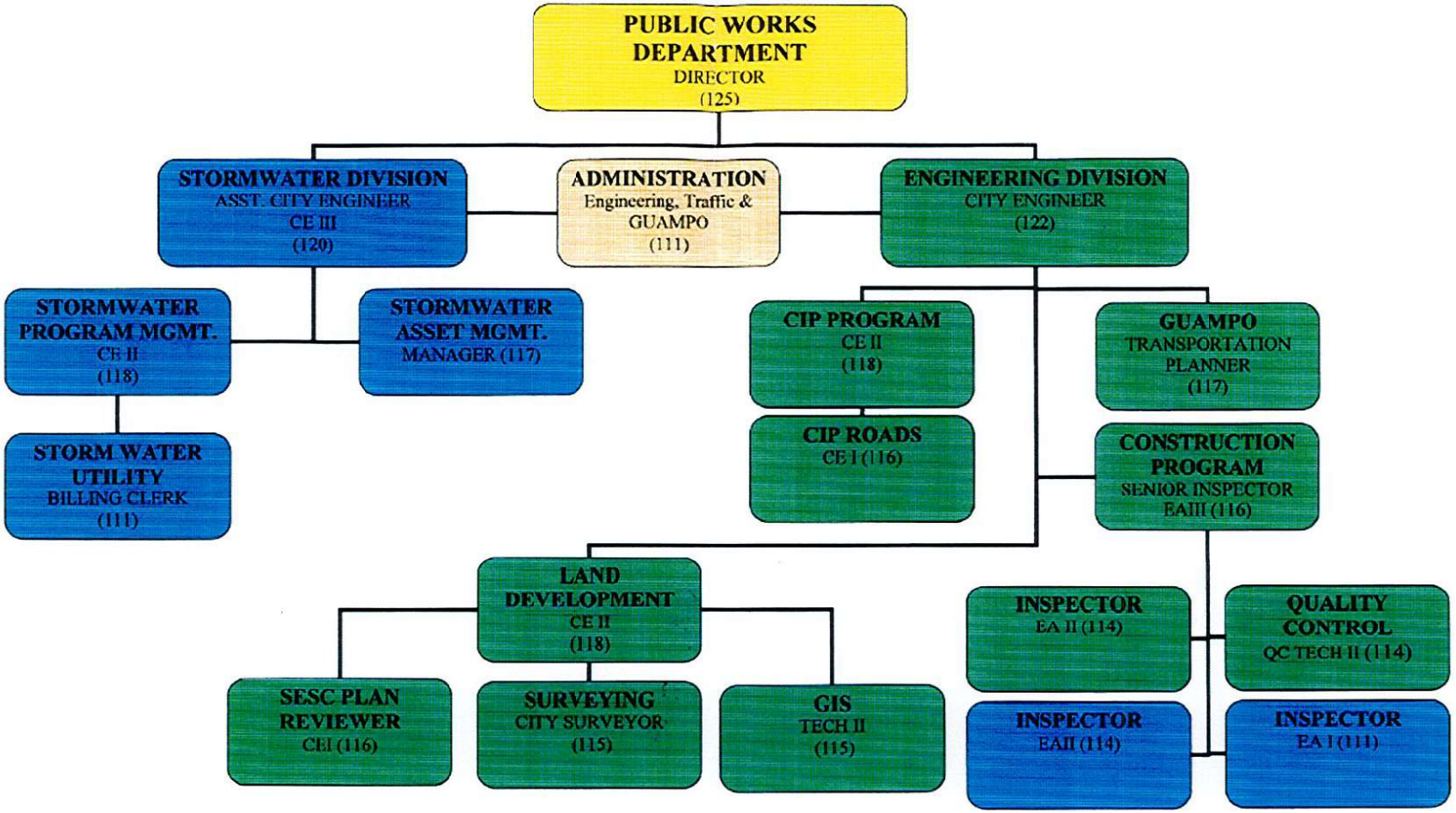
(non-voting)–Bill Marley
Community Planner
Federal Highway Administration

(non-voting)—Anthony Sumpter
Public Transportation Division
NCDOT

(non-voting)—Eliud De Jesus
Mid-East RPO

Appendix C
Organizational Chart

ENGINEERING DIVISION 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:

Subject	Number	Percent
RACE		
Total population	189,510	100.0
One race	185,808	98.0
White	109,925	58.0
Black or African American	65,221	34.4
American Indian and Alaska Native	736	0.4
American Indian, specified [1]	377	0.2
Alaska Native, specified [1]	9	0.0
Both American Indian and Alaska Native, specified [1]	0	0.0
American Indian or Alaska Native, not specified	350	0.2
Asian	2,685	1.4
Native Hawaiian and Other Pacific Islander	103	0.1
Some Other Race	7,138	3.8
Two or More Races	3,702	2.0
Two races with Some Other Race	729	0.4
Two races without Some Other Race	2,663	1.4
Three or more races with Some Other Race	63	0.0
Three or more races without Some Other Race	247	0.1
HISPANIC OR LATINO		
Total population	189,510	100.0
Hispanic or Latino (of any race)	12,256	6.5
Mexican	9,059	4.8
Puerto Rican	930	0.5
Cuban	207	0.1
Other Hispanic or Latino [2]	2,060	1.1
Not Hispanic or Latino	177,254	93.5
RACE AND HISPANIC OR LATINO		
Total population	189,510	100.0
One race	185,808	98.0
Hispanic or Latino	11,443	6.0

Subject	Number	Percent
Not Hispanic or Latino	174,365	92.0
Two or More Races	3,702	2.0
Hispanic or Latino	813	0.4
Not Hispanic or Latino	2,889	1.

X Not applicable.
[1] "American Indian, specified" includes people who provided a specific American Indian tribe, such as Navajo or Blackfeet. "Alaska Native, specified" includes people who provided a specific Alaska Native group, such as Inupiat or Yup'ik.
[2] This category is comprised of people whose origins are from the Dominican Republic, Spain, and Spanish-speaking Central or South American countries. It also includes general origin responses such as "Latino" or "Hispanic."

Source: U.S. Census Bureau, 2010 Census.

Age and Sex

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

Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
Total population	189,510	90,817	98,693	100.0	100.0	100.0	92.0
Under 5 years	12,620	6,514	6,106	6.7	7.2	6.2	106.7
5 to 9 years	11,763	6,086	5,677	6.2	6.7	5.8	107.2
10 to 14 years	11,465	5,843	5,622	6.0	6.4	5.7	103.9
15 to 19 years	16,760	7,754	9,006	8.8	8.5	9.1	86.1
20 to 24 years	22,890	10,692	12,198	12.1	11.8	12.4	87.7
25 to 29 years	14,522	7,215	7,307	7.7	7.9	7.4	98.7
30 to 34 years	12,674	6,286	6,388	6.7	6.9	6.5	98.4
35 to 39 years	12,002	5,928	6,074	6.3	6.5	6.2	97.6
40 to 44 years	11,523	5,728	5,795	6.1	6.3	5.9	98.8
45 to 49 years	12,003	5,726	6,277	6.3	6.3	6.4	91.2
50 to 54 years	12,200	5,707	6,493	6.4	6.3	6.6	87.9
55 to 59 years	10,763	5,106	5,657	5.7	5.6	5.7	90.3
60 to 64 years	9,041	4,257	4,784	4.8	4.7	4.8	89.0
65 to 69 years	6,198	3,021	3,177	3.3	3.3	3.2	95.1
70 to 74 years	4,593	2,020	2,573	2.4	2.2	2.6	78.5
75 to 79 years	3,507	1,384	2,123	1.9	1.5	2.2	65.2
80 to 84 years	2,613	921	1,692	1.4	1.0	1.7	54.4
85 to 89 years	1,582	463	1,119	0.8	0.5	1.1	41.4
90 years and over	791	166	625	0.4	0.2	0.6	26.6

Age	Number			Percent			Males per 100 females
	Both sexes	Male	Female	Both sexes	Male	Female	
Under 18 years	42,750	21,871	20,879	22.6	24.1	21.2	104.8
18 to 64 years	127,476	60,971	66,505	67.3	67.1	67.4	91.7
18 to 24 years	32,748	15,018	17,730	17.3	16.5	18.0	84.7
25 to 44 years	50,721	25,157	25,564	26.8	27.7	25.9	98.4
25 to 34 years	27,196	13,501	13,695	14.4	14.9	13.9	98.6
35 to 44 years	23,525	11,656	11,869	12.4	12.8	12.0	98.2
45 to 64 years	44,007	20,796	23,211	23.2	22.9	23.5	89.6
45 to 54 years	24,203	11,433	12,770	12.8	12.6	12.9	89.5
55 to 64 years	19,804	9,363	10,441	10.5	10.3	10.6	89.7
65 years and over	19,284	7,975	11,309	10.2	8.8	11.5	70.5
65 to 74 years	10,791	5,041	5,750	5.7	5.6	5.8	87.7
75 to 84 years	6,120	2,305	3,815	3.2	2.5	3.9	60.4
85 years and over	2,373	629	1,744	1.3	0.7	1.8	36.1
16 years and over	151,440	71,283	80,157	79.9	78.5	81.2	88.9
18 years and over	146,760	68,946	77,814	77.4	75.9	78.8	88.6
21 years and over	130,909	61,957	68,952	69.1	68.2	69.9	89.9
60 years and over	28,325	12,232	16,093	14.9	13.5	16.3	76.0
62 years and over	24,422	10,381	14,041	12.9	11.4	14.2	73.9
67 years and over	16,558	6,643	9,915	8.7	7.3	10.0	67.0
75 years and over	8,493	2,934	5,559	4.5	3.2	5.6	52.8
Median age (years)	31.8	31.0	32.6	(X)	(X)	(X)	(X)

X Not applicable.
Source: U.S. Census Bureau, 2010 Census.
Summary File 1, Tables P12, P13, and PCT12.

Disability

The following table was completed using data from Census Table S1810, Disability Characteristics dated 2017:

Subject	Greenville, NC Metro Area					
	Total		With a disability		Percent with a disability	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total civilian noninstitutionalized population	177,667	+/-645	23,223	+/-2,995	13.1%	+/-1.7
SEX						
Male	84,562	+/-1,106	10,633	+/-2,014	12.6%	+/-2.4
Female	93,105	+/-1,138	12,590	+/-1,728	13.5%	+/-1.8
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	101,249	+/-1,792	12,760	+/-2,075	12.6%	+/-2.1
Black or African American alone	61,546	+/-1,146	9,630	+/-2,197	15.6%	+/-3.6
American Indian and Alaska Native alone	N	N	N	N	N	N
Asian alone	N	N	N	N	N	N
Native Hawaiian and Other Pacific Islander alone	N	N	N	N	N	N
Some other race alone	N	N	N	N	N	N
Two or more races	N	N	N	N	N	N
White alone, not Hispanic or Latino	96,685	+/-765	12,308	+/-2,024	12.7%	+/-2.1
Hispanic or Latino (of any race)	11,326	+/-75	787	+/-500	6.9%	+/-4.4
AGE						
Under 5 years	10,410	+/-733	219	+/-359	2.1%	+/-3.4
5 to 17 years	27,634	+/-796	2,442	+/-1,446	8.8%	+/-5.2
18 to 34 years	57,269	+/-1,385	2,511	+/-1,187	4.4%	+/-2.1
35 to 64 years	59,944	+/-1,091	7,679	+/-1,607	12.8%	+/-2.7
65 to 74 years	13,609	+/-679	5,866	+/-1,144	43.1%	+/-8.7
75 years and over	8,801	+/-647	4,506	+/-919	51.2%	+/-10.8
DISABILITY TYPE BY DETAILED AGE						
With a hearing difficulty	(X)	(X)	6,257	+/-1,571	3.5%	+/-0.9
Population under 18 years	38,044	+/-568	219	+/-359	0.6%	+/-0.9
Population under 5 years	10,410	+/-733	219	+/-359	2.1%	+/-3.4
Population 5 to 17 years	27,634	+/-796	0	+/-207	0.0%	+/-0.6
Population 18 to 64 years	117,213	+/-983	1,829	+/-774	1.6%	+/-0.7

Subject	Greenville, NC Metro Area					
	Total		With a disability		Percent with a disability	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 18 to 34 years	57,269	+/-1,385	539	+/-466	0.9%	+/-0.8
Population 35 to 64 years	59,944	+/-1,091	1,290	+/-604	2.2%	+/-1.0
Population 65 years and over	22,410	+/-491	4,209	+/-1,339	18.8%	+/-6.0
Population 65 to 74 years	13,609	+/-679	2,136	+/-929	15.7%	+/-6.7
Population 75 years and over	8,801	+/-647	2,073	+/-882	23.6%	+/-9.9
With a vision difficulty	(X)	(X)	4,875	+/-1,175	2.7%	+/-0.7
Population under 18 years	38,044	+/-568	607	+/-449	1.6%	+/-1.2
Population under 5 years	10,410	+/-733	0	+/-207	0.0%	+/-1.7
Population 5 to 17 years	27,634	+/-796	607	+/-449	2.2%	+/-1.6
Population 18 to 64 years	117,213	+/-983	1,624	+/-639	1.4%	+/-0.5
Population 18 to 34 years	57,269	+/-1,385	269	+/-209	0.5%	+/-0.4
Population 35 to 64 years	59,944	+/-1,091	1,355	+/-613	2.3%	+/-1.0
Population 65 years and over	22,410	+/-491	2,644	+/-679	11.8%	+/-3.1
Population 65 to 74 years	13,609	+/-679	1,240	+/-668	9.1%	+/-4.9
Population 75 years and over	8,801	+/-647	1,404	+/-618	16.0%	+/-7.2
With a cognitive difficulty	(X)	(X)	9,097	+/-2,060	5.4%	+/-1.2
Population under 18 years	27,634	+/-796	1,618	+/-1,374	5.9%	+/-5.0
Population 18 to 64 years	117,213	+/-983	4,045	+/-1,386	3.5%	+/-1.2
Population 18 to 34 years	57,269	+/-1,385	1,683	+/-914	2.9%	+/-1.6
Population 35 to 64 years	59,944	+/-1,091	2,362	+/-838	3.9%	+/-1.4
Population 65 years and over	22,410	+/-491	3,434	+/-1,186	15.3%	+/-5.2
Population 65 to 74 years	13,609	+/-679	1,917	+/-835	14.1%	+/-6.1
Population 75 years and over	8,801	+/-647	1,517	+/-752	17.2%	+/-8.4
With an ambulatory difficulty	(X)	(X)	13,027	+/-2,048	7.8%	+/-1.2
Population under 18 years	27,634	+/-796	594	+/-500	2.1%	+/-1.8
Population 18 to 64 years	117,213	+/-983	4,746	+/-1,274	4.0%	+/-1.1
Population 18 to 34 years	57,269	+/-1,385	542	+/-489	0.9%	+/-0.9
Population 35 to 64 years	59,944	+/-1,091	4,204	+/-1,108	7.0%	+/-1.9
Population 65 years and over	22,410	+/-491	7,687	+/-1,412	34.3%	+/-6.4
Population 65 to 74 years	13,609	+/-679	4,705	+/-1,183	34.6%	+/-8.9
Population 75 years and over	8,801	+/-647	2,982	+/-819	33.9%	+/-9.5
With a self-care difficulty	(X)	(X)	4,253	+/-1,269	2.5%	+/-0.8

Subject	Greenville, NC Metro Area					
	Total		With a disability		Percent with a disability	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population under 18 years	27,634	+/-796	220	+/-263	0.8%	+/-0.9
Population 18 to 64 years	117,213	+/-983	1,968	+/-975	1.7%	+/-0.8
Population 18 to 34 years	57,269	+/-1,385	543	+/-524	0.9%	+/-0.9
Population 35 to 64 years	59,944	+/-1,091	1,425	+/-833	2.4%	+/-1.4
Population 65 years and over	22,410	+/-491	2,065	+/-666	9.2%	+/-3.0
Population 65 to 74 years	13,609	+/-679	927	+/-457	6.8%	+/-3.4
Population 75 years and over	8,801	+/-647	1,138	+/-547	12.9%	+/-6.0
With an independent living difficulty	(X)	(X)	7,544	+/-1,637	5.4%	+/-1.2
Population 18 to 64 years	117,213	+/-983	2,522	+/-1,083	2.2%	+/-0.9
Population 18 to 34 years	57,269	+/-1,385	973	+/-733	1.7%	+/-1.3
Population 35 to 64 years	59,944	+/-1,091	1,549	+/-734	2.6%	+/-1.2
Population 65 years and over	22,410	+/-491	5,022	+/-1,154	22.4%	+/-5.2
Population 65 to 74 years	13,609	+/-679	2,530	+/-951	18.6%	+/-6.9
Population 75 years and over	8,801	+/-647	2,492	+/-825	28.3%	+/-9.5

Subject	Greenville, NC Metro Area					
	Total		With a disability		Percent with a disability	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error

Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates
Explanation of Symbols:

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6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.

Poverty

The following table was completed using data from Census Table S1701, Poverty Status in 2017:

Subject	Greenville, NC Metro Area					
	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	173,030	+/-1,239	38,138	+/-5,018	22.0%	+/-2.9
AGE						
Under 18 years	38,012	+/-575	12,590	+/-2,737	33.1%	+/-7.2
Under 5 years	10,410	+/-733	3,667	+/-965	35.2%	+/-9.8
5 to 17 years	27,602	+/-801	8,923	+/-2,373	32.3%	+/-8.6
Related children of householder under 18 years	37,689	+/-660	12,267	+/-2,781	32.5%	+/-7.3
18 to 64 years	112,608	+/-1,506	23,989	+/-2,856	21.3%	+/-2.5
18 to 34 years	52,587	+/-1,697	15,596	+/-2,493	29.7%	+/-4.5
35 to 64 years	60,021	+/-1,084	8,393	+/-1,828	14.0%	+/-3.0
60 years and over	32,419	+/-1,291	2,549	+/-813	7.9%	+/-2.6
65 years and over	22,410	+/-491	1,559	+/-706	7.0%	+/-3.2
SEX						
Male	83,139	+/-1,187	14,497	+/-2,446	17.4%	+/-2.9
Female	89,891	+/-1,532	23,641	+/-3,408	26.3%	+/-3.8
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	97,864	+/-1,971	12,629	+/-2,696	12.9%	+/-2.7
Black or African American alone	60,409	+/-1,315	21,099	+/-4,473	34.9%	+/-7.4
American Indian and Alaska Native alone	N	N	N	N	N	N
Asian alone	N	N	N	N	N	N
Native Hawaiian and Other Pacific Islander alone	N	N	N	N	N	N
Some other race alone	6,968	+/-1,790	3,867	+/-2,387	55.5%	+/-28.7
Two or more races	N	N	N	N	N	N
Hispanic or Latino origin (of any race)	10,955	+/-337	3,713	+/-2,297	33.9%	+/-21.0
White alone, not Hispanic or Latino	93,671	+/-1,008	12,337	+/-2,668	13.2%	+/-2.8
EDUCATIONAL ATTAINMENT						
Population 25 years and over	106,859	+/-966	14,465	+/-2,605	13.5%	+/-2.4
Less than high school graduate	10,248	+/-2,073	2,760	+/-1,177	26.9%	+/-9.8

Subject	Greenville, NC Metro Area					
	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
High school graduate (includes equivalency)	21,727	+/-2,540	4,854	+/-1,496	22.3%	+/-6.2
Some college, associate's degree	37,752	+/-3,698	4,712	+/-1,427	12.5%	+/-3.5
Bachelor's degree or higher	37,132	+/-3,082	2,139	+/-893	5.8%	+/-2.4
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	91,702	+/-3,479	13,038	+/-2,266	14.2%	+/-2.4
Employed	84,782	+/-3,131	9,400	+/-1,692	11.1%	+/-2.0
Male	41,149	+/-1,964	4,351	+/-1,129	10.6%	+/-2.7
Female	43,633	+/-2,550	5,049	+/-1,343	11.6%	+/-2.9
Unemployed	6,920	+/-2,054	3,638	+/-1,312	52.6%	+/-13.0
Male	2,584	+/-1,116	1,135	+/-569	43.9%	+/-21.6
Female	4,336	+/-1,443	2,503	+/-1,111	57.7%	+/-16.6
WORK EXPERIENCE						
Population 16 years and over	139,084	+/-1,406	26,968	+/-3,121	19.4%	+/-2.2
Worked full-time, year-round in the past 12 months	56,732	+/-3,209	1,984	+/-733	3.5%	+/-1.3
Worked part-time or part-year in the past 12 months	38,236	+/-4,035	11,100	+/-1,810	29.0%	+/-4.5
Did not work	44,116	+/-3,273	13,884	+/-2,628	31.5%	+/-4.7
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING POVERTY RATIOS						
50 percent of poverty level	23,694	+/-4,606	(X)	(X)	(X)	(X)
125 percent of poverty level	47,766	+/-5,870	(X)	(X)	(X)	(X)
150 percent of poverty level	54,893	+/-6,104	(X)	(X)	(X)	(X)
185 percent of poverty level	65,447	+/-6,080	(X)	(X)	(X)	(X)
200 percent of poverty level	70,417	+/-5,940	(X)	(X)	(X)	(X)
300 percent of poverty level	99,724	+/-5,850	(X)	(X)	(X)	(X)
400 percent of poverty level	119,149	+/-5,215	(X)	(X)	(X)	(X)
500 percent of poverty level	138,891	+/-4,606	(X)	(X)	(X)	(X)
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	39,687	+/-3,779	14,363	+/-2,460	36.2%	+/-5.4

Subject	Greenville, NC Metro Area					
	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Male	18,955	+/-2,346	5,630	+/-1,310	29.7%	+/-7.1
Female	20,732	+/-2,755	8,733	+/-1,832	42.1%	+/-6.7
15 years	0	+/-207	0	+/-207	-	**
16 to 17 years	105	+/-136	105	+/-136	100.0%	+/-67.6
18 to 24 years	15,843	+/-2,377	9,212	+/-1,739	58.1%	+/-8.0
25 to 34 years	6,884	+/-1,709	1,956	+/-788	28.4%	+/-12.9
35 to 44 years	3,076	+/-998	629	+/-562	20.4%	+/-15.9
45 to 54 years	3,401	+/-1,320	182	+/-160	5.4%	+/-4.8
55 to 64 years	3,993	+/-996	1,302	+/-624	32.6%	+/-12.7
65 to 74 years	3,552	+/-1,134	404	+/-346	11.4%	+/-9.7
75 years and over	2,833	+/-767	573	+/-354	20.2%	+/-12.5
Mean income deficit for unrelated individuals (dollars)	7,754	+/-718	(X)	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	14,565	+/-2,963	1,045	+/-605	7.2%	+/-3.8
Worked less than full-time, year-round in the past 12 months	13,361	+/-2,094	7,013	+/-1,662	52.5%	+/-9.5
Did not work	11,761	+/-2,392	6,305	+/-1,666	53.6%	+/-10.4

Subject	Greenville, NC Metro Area				
	Total		Below poverty level		Pe
	Estimate	Margin of Error	Estimate	Margin of Error	Es

Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates
Explanation of Symbols:

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Household Income

The following table was completed using data from Census Table S1901, Income in the Past 12 Months (In 2013 Inflation-Adjusted Dollars):

Subject	Greenville, NC Metro Area							
	Households		Families		Married-couple families		Nonfamily households	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total	68,505	+/-2,253	43,391	+/-2,425	N	N	25,114	+/-2,269
Less than $10,000	11.3%	+/-2.3	8.5%	+/-2.7	N	N	17.0%	+/-4.3
$10,000 to $14,999	5.7%	+/-1.8	3.1%	+/-1.6	N	N	10.3%	+/-3.8
$15,000 to $24,999	13.8%	+/-3.0	9.4%	+/-2.9	N	N	21.6%	+/-6.1
$25,000 to $34,999	9.1%	+/-2.1	6.6%	+/-2.3	N	N	13.3%	+/-4.3
$35,000 to $49,999	12.9%	+/-2.4	12.5%	+/-3.1	N	N	13.1%	+/-3.7
$50,000 to $74,999	19.3%	+/-3.0	20.6%	+/-3.5	N	N	16.8%	+/-4.5
$75,000 to $99,999	9.0%	+/-1.9	12.5%	+/-2.9	N	N	3.5%	+/-1.6
$100,000 to $149,999	11.3%	+/-1.8	16.3%	+/-2.8	N	N	2.8%	+/-1.7
$150,000 to $199,999	3.7%	+/-1.3	5.7%	+/-2.1	N	N	0.4%	+/-0.6
$200,000 or more	3.8%	+/-1.2	4.8%	+/-1.7	N	N	1.1%	+/-1.1
Median income (dollars)	45,849	+/-4,471	62,768	+/-4,274	81,633	+/-7,381	26,091	+/-5,950
Mean income (dollars)	66,154	+/-5,267	81,659	+/-8,148	N	N	36,461	+/-4,350
PERCENT ALLOCATED								
Household income in the past 12 months	48.2%	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Family income in the past 12 months	(X)	(X)	49.3%	(X)	(X)	(X)	(X)	(X)
Nonfamily income in the past 12 months	(X)	(X)	(X)	(X)	(X)	(X)	46.4%	(X)

Subject	Greenville, NC Metro Area							
	Households		Families		Married-couple families		Nonfamily ho	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Marg

Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates
Explanation of Symbols:

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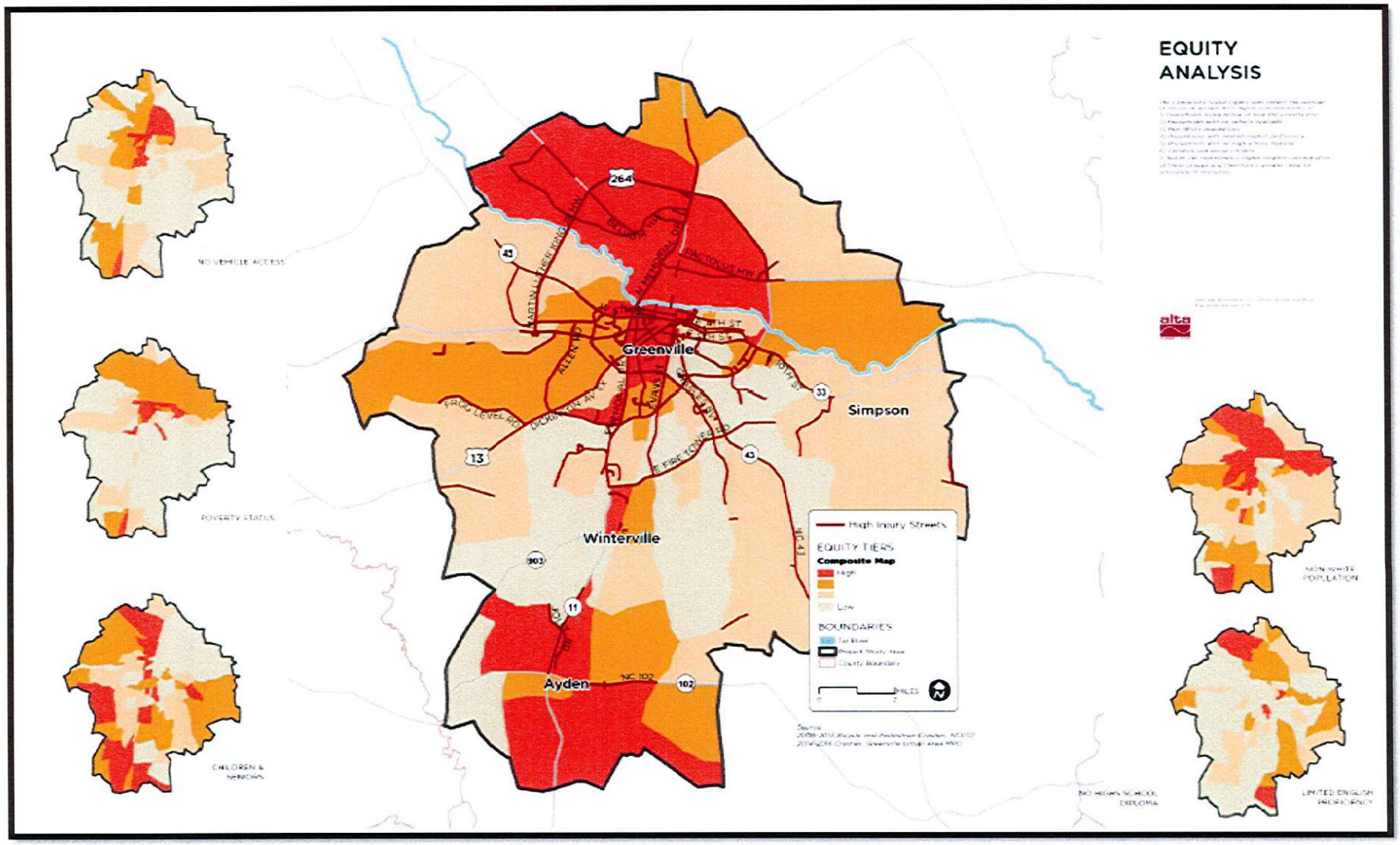
Appendix E
Demographic/Equity Maps



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.]

Greenville Urban Area Metropolitan Planning Organization

DISCRIMINATION COMPLAINT FORM

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

Last Name:	First Name:	☐ Male ☐ Female

Mailing Address:	City	State	Zip

Home Telephone:	Work Telephone:	E-mail Address

Identify the Category of Discrimination:

☐ RACE ☐ COLOR ☐ NATIONAL ORIGIN ☐ AGE

☐ SEX ☐ DISABILITY ☐ LIMITED ENGLISH PROFICIENCY

Identify the Race of the Complainant

☐ Black ☐ White ☐ Hispanic ☐ Asian American

☐ American Indian ☐ Alaskan Native ☐ Pacific Islander ☐ Other _____

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

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

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

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

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

Name	Address	Telephone
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 Greenville Urban Area Metropolitan Planning Organization (GUAMPO) representative? If yes, provide the name, position, and date of discussion.

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

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

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

_____	_____
COMPLAINANT'S SIGNATURE	**DATE**

MAIL COMPLAINT FORM TO:

Greenville Urban Area Metropolitan Planning Organization
1500 Beatty Street
Greenville, NC 27834
252-329-4476

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: ☐NCDOT ☐FHWA **Date Referred:**_____

DISCRIMINATION COMPLAINTS LOG

Log Year(s):

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

No Complaints or Lawsuits ☐

I certify that to the best of my knowledge, the above described complaints or lawsuits alleging discrimination, or **no complaints or lawsuits** alleging discrimination, have been filed with or against the Greenville Urban Area Metropolitan Planning Organization since the previous Title VI Program submission to NCDOT.

Signature of Title VI Coordinator or Other Authorized Official

Date 5/14/2019

Bryan Pittle

Print Name and Title of Authorized Official

Appendix G
Compliance Review Checklist for FHWA Sub-recipients

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

RESOLUTION NO. 2019-03-GUAMPO
ADOPTING THE GREENVILLE URBAN AREA METROPOLITAN PLANNING ORGANIZATION'S TITLE VI PLAN

WHEREAS, the City of Greenville Urban Area Metropolitan Planning Organization has been designated by the Governor of the State of North Carolina as the Metropolitan Planning Organization (MPO) responsible, together with the State, for the comprehensive, continuing, and cooperative transportation planning process for the MPO's metropolitan planning area; and

WHEREAS, the Transportation Advisory Committee is the governing body of the Greenville Urban Area MPO; and

WHEREAS, the Transportation Advisory Committee has found that the Greenville Urban Area Metropolitan Planning Organization is conducting transportation planning in a continuous, cooperative, and comprehensive manner in accordance with 23 U.S.C. 134 and 49 U.S.C. 1607; and

WHEREAS, the purpose of Title VI of the United States Civil Rights Act of 1964 and subsequent legislation, regulations, statutes and orders is to prohibit programs that receive Federal funds from discriminating against participants on the basis of race, color, national origin, disability, age, gender, or income status; and

WHEREAS, the Transportation Advisory Committee has considered how the Transportation Planning Process will affect the involvement of Disadvantaged Business Enterprises in the FHWA and the FTA funded planning projects (Sec. 105(f), Pub. L. 97-424, 96 Stat. 2100, 49 CFR part 23); and

WHEREAS, the Transportation Advisory Committee has considered how the Transportation Planning Process will affect the elderly and the disabled per the provision of the Americans with Disabilities Act of 1990 (Pub. L. 101-336, 104 Stat. 327, as amended) and the U.S.D.O.T. implementing regulations; and

WHEREAS, the Transportation Advisory Committee has found the Transportation Planning Process to be in full compliance with Title VI of the Civil Rights Act of 1964 and the Title VI Assurance executed by each State under 23 U.S.C. 324 and 29 U.S.C. 794;

NOW THEREFORE, be it resolved that the Transportation Advisory Committee for the Greenville Urban Area hereby certifies compliance with policies, procedures and plans with regard to Title VI of the Civil Rights Act of 1964 (as amended) and additional assurances as required, and hereby adopt the MPO's Title VI plan.

Today, May 1, 2019.

Mayor P.J. Connelly, Chair
Transportation Advisory Committee
Greenville Urban Area MPO

Amanda Braddy, Secretary