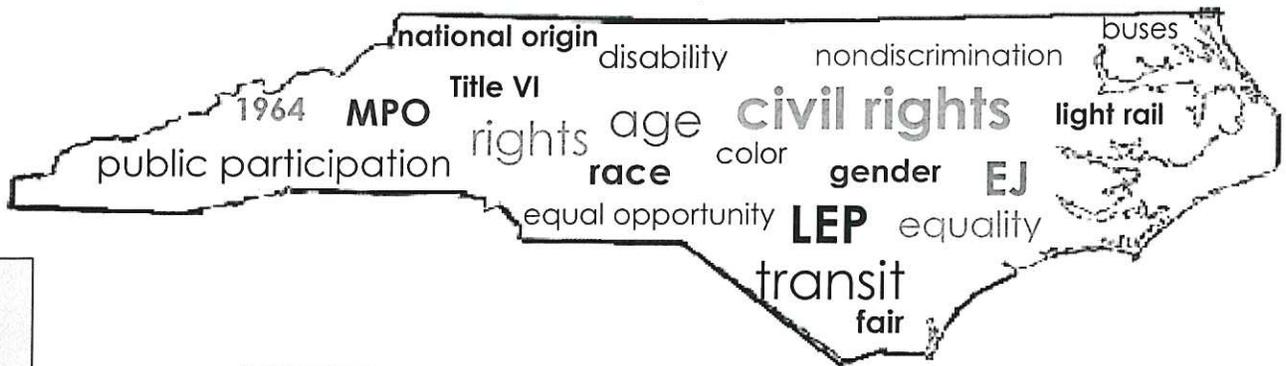
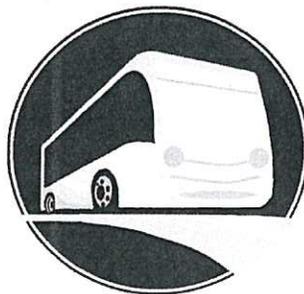


HOKE AREA TRANSIT SERVICE



May 15, 2023

Title VI Program Plan

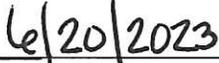


TITLE VI PLAN REVIEW AND ADOPTION

On behalf of the Hoke County Board of Commissioners, I hereby acknowledge receipt of the Title VI Nondiscrimination Plan. We, the Hoke County Board of Commissioners, have **reviewed and hereby adopt** this Plan. We are committed to ensuring that all decisions are made in accordance with the nondiscrimination guidelines of this Plan, to the end the no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Hoke Area Transit Services and activities on the basis of race, color, national origin, sex, age, creed (religion), or disability, as protected by Title VI of the Civil Rights Act of 1964 and the nondiscrimination provisions of the Federal Transit Administration.



Signature of Authorizing Official



DATE

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TITLE VI NONDISCRIMINATION AGREEMENT
BETWEEN
THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION
AND
HOKE AREA TRANSIT SERVICE

In accordance with DOT Order 1050.2A, Hoke Area Transit Service (HATS) assures the North Carolina Department of Transportation (NCDOT) that no person shall, on the ground of **race, color, national origin, sex, creed, age, or disability**, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and related nondiscrimination authorities, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by (HATS).

Further, HATS hereby agrees to:

1. Designate a Title VI Coordinator that has a responsible position within the organization and easy access to the Director of the organization.
2. Issue a policy statement, signed by the Director of the organization, which expresses a commitment to the nondiscrimination provisions of Title VI and related applicable statutes. The signed policy statement shall be posted and circulated throughout the organization and to the general public and published where appropriate in languages other than English. The policy statement will be re-signed when there is a change of Director.
3. Insert the clauses of the contract language from Section 6.1 in every contract awarded by the organization. Ensure that every contract awarded by the organization's contractors or consultants also includes the contract language.
4. Process all and, when required, investigate complaints of discrimination consistent with the procedures contained within this Plan. Log all complaints for the administrative record.
5. Collect statistical data (race, color, national origin, sex, age, disability) on participants in, and beneficiaries of, programs and activities carried out by the organization.
6. Participate in training offered on Title VI and other nondiscrimination requirements. Conduct or request training for employees or the organization's subrecipients.
7. Take affirmative action, if reviewed or investigated by NCDOT, to correct any deficiencies found within a reasonable time period, not to exceed 90 calendar days, unless reasonable provisions are granted by NCDOT.
8. Document all Title VI nondiscrimination-related activities as evidence of compliance. Submit information and reports to NCDOT on a schedule outlined by NCDOT.

THIS AGREEMENT is given in consideration of, and for the purpose of obtaining, any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding.



Authorized Signature

Date
6/20/2023

Allen Thomas, Jr.
Hoke County BOC Chairperson

1.0 INTRODUCTION

Title VI of the 1964 Civil Rights Act, 42 U.S.C. 2000d provides that: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The broader application of nondiscrimination law is found in other statutes, executive orders, and regulations, which provide additional protections based on age, sex, creed (religion), and disability, including the 1987 Civil Rights Restoration Act, which extended nondiscrimination coverage to all programs and activities of federal-aid recipients, subrecipients, and contractors, including those that are not federally-funded (see Appendix A – Applicable Nondiscrimination Authorities).

HATS is a recipient of Federal Transit Administration (FTA) funds from the North Carolina Department of Transportation (NCDOT). HATS establishes this Title VI Nondiscrimination Plan for the purpose of complying with Title VI of the Civil Rights Act of 1964, as required by FTA Circular 4702.1B, and related requirements outlined within the FTA Certifications & Assurances, "Nondiscrimination Assurance." This document details the nondiscrimination program, policies, and practices administered by HATS, and will be updated periodically to incorporate changes and additional responsibilities as they are made. This Plan will be submitted to NCDOT or FTA, upon request.

2.0 DESCRIPTION OF PROGRAMS AND SERVICES

2.1 PROGRAM(S) AND SERVICES ADMINISTERED

HATS provides public transportation options to its customers within Hoke County, North Carolina. This transportation is available to the elderly, disabled, and general-public residents Monday through Friday from 2:30 a.m. to 7:00 p.m. for trips to local agencies, work, non-emergency medical appointments, individual shopping trips, community college, nutrition sites, and senior centers. HATS does not operate on holidays that have been approved by the Hoke County Board of Commissioners. These holidays are listed on the Hoke County website. Transportation reservations should be made by 11 AM by the day before needing service by calling our office at 910-875-8696. Medicaid transportation clients should call DSS at 910-878-4041.

HATS receives Rural Operating Assistance Program funding from state funds to supplement the cost of non-Medicaid trips. The rider fare for in-county are as follows:

Children and Seniors \$0.75 one-way trip.

Adults (in city limits) \$1.00 one-way trip.

In County trips \$2.25 one-way trip.

Out of County \$5.00 one-way trip.

Medical Out of County

Moore \$7.50 one-way trip. (Children & Seniors \$3.75)

Cumberland \$7.50 one-way trip. (Children & Seniors \$3.75)

Robeson \$7.50 one-way trip. (Children & Seniors \$3.75)

Scotland \$7.50 one-way trip. (Children & Seniors \$3.75)

Lee \$15.00 one-way trip. (Children & Seniors \$7.50)

Wake \$15.00 one-way trip. (Children & Seniors \$7.50)

Orange \$15.00 one-way trip. (Children & Seniors \$7.50)

Hours of Service Monday - Friday 2:30 AM - 7:00 PM

HATS staff includes the following: Transportation Director, Transportation Supervisor, Transportation Scheduler/Dispatch, Transportation Clerks (2 Part-Time), Transportation Helper (1 Part-Time), 12 full time drivers, and 8 part time drivers.

2.2 FUNDING SOURCES / TABLES

For the purpose of federally assisted programs, "federal assistance" shall include:

1. grants and loans of Federal funds;
2. the grant or donation of Federal property and interest in property;
3. the detail of Federal personnel;
4. the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and
5. any Federal agreement, arrangement, or other contract which has, as one of its purposes, the provision of assistance.

Each FTA Formula Grant received by our system, and whether the funds were received through NCDOT or directly from FTA, is checked below.

Grant Title	NCDOT	FTA	Details (i.e., purpose, frequency, and duration of receipt)
5307 (Urbanized Operating Funding)		X	Operating costs for urbanized areas. 50% Match
5311 (Formula Grants for Other than Urbanized Areas)	X		Funds received annually for both Admin and Capital costs.
5311 (b)(3) (Rural Transit Assistance)	X		Funds received annually for both Admin and Capital costs.

2.3 DECISION-MAKING PROCESS

The Hoke County Board of Commissioners is the governing Board for Hoke Area Transportation, and they make the final decision on adopting program documents. The BOC meets once per month. When approval from the BOC is needed, a request will be made by the agency Director with all pertinent information being sent to the County Manager for approval and then to put on the BOC agenda. All plans, policies, grants, rate changes, and budgets are required to be adopted by the BOC. Hoke County Local Coordinated Plan (LCP) must be approved every four years. Drug and Alcohol, System Safety Plan, and Title VI Plan are initially approved by the BOC, as well as any revisions or needed updates. The BOC approves by vote from the five.

Any documents that need BOC approval will be discussed and voted on by the Transportation Advisory Board at a quarterly meeting that is currently held on the third Wednesday of January, April, July, and October, prior to sending to the BOC for final approval. TAB also may vote on issues that do not require BOC approval.

Board or Committee Name	Appointed	Elected	# of Members
Transit Advisory Board	X		11
Board of Commissioners		X	5

2.4 TITLE VI COORDINATOR

The individual below has been designated as the Title VI Coordinator for HATS, and is empowered with enough authority and responsibility to implement the Title VI Nondiscrimination Program:

Name Nancy Thornton
Official Title Director, Hoke Area Transit Service
Address 316 Magnolia Street, Raeford, NC, 28376
Phone (910) 875-8696
Email nthornton@hokecounty.org

Key responsibilities of the Coordinator include:

- Maintaining knowledge of Title VI and related requirements.
- Attending civil rights training when offered by NCDOT or any other regulatory agency.
- Administering the Title VI Nondiscrimination Program and coordinating implementation of this Plan.
- Training internal staff and officials on their Title VI nondiscrimination obligations.
- Disseminating Title VI information internally and to the general 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.
- Implementing procedures for prompt processing (receiving, logging, investigating and/or forwarding) of discrimination complaints.
- Coordinating with, and providing information to, NCDOT and other regulatory agencies during compliance reviews or complaint investigations.
- Promptly resolving areas of deficiency to ensure compliance with Title VI nondiscrimination requirements.

2.5 CHANGE OF TITLE VI COORDINATOR AND/OR HATS DIRECTOR

If Title VI Coordinator or HATS Director changes, this document and all other documents that name the Co-ordinator, will immediately be updated, and an updated policy statement will be signed by the new HATS Director.

2.6 ORGANIZATIONAL CHART

HATS currently employs 25 staff which consist of the following job categories:

- Director
- Transportation Supervisor
- Transportation Scheduler/Dispatch
- Transportation Clerk (2 Part Time)
- Transportation Helper (1 Part Time)
- Drivers (20)

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

2.7 SUBRECIPIENTS

Hoke Area Transit does not have pass through funds to any other organizations and, therefore, does not have any subrecipients.

3.0 TITLE VI NONDISCRIMINATION POLICY STATEMENT

It is the policy of HATS, as a federal-aid recipient, to ensure that no person shall, on the ground of **race, color, national origin, sex, creed (religion), age or disability**, 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, the Civil Rights Restoration Act of 1987, and all other related nondiscrimination laws and requirements.



Allen Thomas, Jr., Hoke County BOC
Chairperson
6/20/2023

Date

Title VI and Related Authorities

Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d) provides that, “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” The 1987 Civil Rights Restoration Act (P.L. 100-259) clarified and restored the original intent of Title VI by expanding the definition of “programs and activities” to include all programs and activities of federal-aid recipients, subrecipients, and contractors, whether such programs and activities are federally assisted or not.

Related nondiscrimination authorities include, but are not limited to: U.S. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act”; 49 U.S.C. 5332, “Nondiscrimination (Public Transportation)”; FTA Circular 4702.1B - Title VI Requirements and Guidelines for Federal Transit Administration Recipients; DOT Order 5610.2a, “Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”; FTA C 4703.1 - Environmental Justice Policy Guidance For Federal Transit Administration Recipients; Policy Guidance Concerning (DOT) Recipient’s Responsibilities to Limited English Proficient (LEP) Persons, 74 FR 74087; The Americans with Disabilities Act of 1990, as amended, P.L. 101-336; Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 790; Age Discrimination Act of 1975, as amended 42 U.S.C. 6101; Title IX of the Education Amendments of 1972, 20 U.S.C. 1681; Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 U.S.C. 4601; Section 508 of the Rehabilitation Act of 1973, 29 U.S.C. 794d

Implementation

- This statement will be signed by the Director of Hoke Area Transit Service 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, inside vehicles, and disseminated within brochures and other written materials.
- The *core* of the statement (signature excluded) will circulate *internally* within annual acknowledgement forms.
- The statement will be posted or provided in languages other than English, when appropriate.

4.0 NOTICE OF NONDISCRIMINATION

- Hoke Area Transit Service operates its programs and services without regard to **race, color, national origin, sex, creed (religion), age, and disability** in accordance with Title VI of the Civil Rights Act and related statutes. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice may file a complaint with Hoke Area Transit Service.
- For more information on HATS's civil rights program, and the procedures to file a complaint, contact 910-299-0127, (TTY 877-243-2823); email nthornton@hokecounty.org; or visit our administrative office at 316 Magnolia Street, Raeford, NC 28307. For more information, visit www.hokecounty.net
- If information is needed in another language, contact (910) 875-8696.
- A complainant may file a complaint directly with the North Carolina Department of Transportation by filing with the Office of Civil Rights, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511, Attention: Title VI Nondiscrimination Program; phone: 919-508-1808 or 800-522-0453, or TDD/TTY: 800-735-2962.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Implementation

- The notice will be posted in its entirety on our website and in any documents and reports we distribute.
- The notice will be posted in our offices and inside our vehicles.
- Ads in newspapers and other publications shall include the following: "Hoke Area Transit Service operates without regard to **race, color, national origin, sex, creed (religion), age or disability**. For more information on Hoke Area Transit Service's Title VI program or how to file a discrimination complaint, please contact Nancy Thornton at 910-875-8696 or nthornton@hokecounty.org."
- The statement will be posted or provided in languages other than English and Spanish.

5.0 PROCEDURES TO ENSURE NONDISCRIMINATORY ADMINISTRATION OF PROGRAMS AND SERVICES

We are committed to nondiscriminatory administration of our programs and services, organization wide. HATS will remind employees of Title VI nondiscrimination obligations through staff training and use of the **Annual Education and Acknowledgment Form** below. The Title VI Coordinator will periodically assess program operations to ensure this policy is being followed.

Annual Education and Acknowledgement Form

Title VI Nondiscrimination Policy

(Title VI and related nondiscrimination authorities)

No person shall, on the grounds of race, color, national origin, sex, age, creed, or disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity of a Federal-aid recipient.

All employees and representatives of HATS are expected to consider, respect, and observe this policy in their daily work and duties. If any person approaches you with a civil rights-related question or complaint, please direct him or her to Nancy Thornton at 910-875-8696 or nthornton@hokecounty.org.

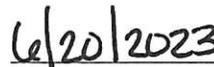
In all dealings with the public, use courtesy titles (e.g., Mr., Mrs., Miss, Dr.) to address or refer to them without regard to their race, color, national origin, sex, age or disability.

Acknowledgement of Receipt of Title VI Program

I hereby acknowledge receipt of HATS's Title VI Program and other nondiscrimination guidelines. I have read the Title VI Program and I am committed to ensuring that no person is excluded from participation in or denied the benefits of HATS's programs, policies, services and activities on the basis of race, color, national origin, sex, age, creed (religion), or disability, as provided by Title VI of the Civil Rights Act of 1964 and related nondiscrimination statutes.



Signature



Date

Implementation

- Periodically, but not more than once a year, employees and representatives will receive, review and certify commitment to the Title VI Program.
- New employees shall be informed of Title VI provisions and expectations to perform their duties, accordingly, asked to review the Title VI Program, and required to sign the acknowledgement form.
- Periodic review of operational practices and guidelines by the Title VI Coordinator to verify compliance with the Title VI Program. Maintain documents of each review on file.
- Signed acknowledgement forms and records of internal assessments will remain on file for at least three years.

6.0 CONTRACT ADMINISTRATION

HATS ensures all contractors will fulfill their contracts in a nondiscriminatory manner. While contractors are not required to prepare a Title VI Program, they must comply with the nondiscrimination requirements of the organization to which they are contracted. HATS and its contractors will not discriminate in the selection and retention of contractors (at any level) or discriminate in employment practices in connection with any of our projects.

6.1 CONTRACT LANGUAGE

I. 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 Transit Administration (FTA), 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, national origin, sex, age, creed (religion), low-income, limited English proficiency, or disability 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 Subcontractors, Including Procurements of Materials and Equipment: In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier 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 FTA 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 FTA, 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 Nondiscrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FTA 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) canceling, 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 FTA 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.

II. 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);
 - Federal transit laws, specifically 49 U.S.C. § 5332 (prohibiting discrimination based on race, color, religion, national origin, sex (including gender identity), disability, age, employment, or business opportunity).
- *The Contractor has read and is familiar with the terms above:
- Contractor's Initials
Date

Implementation

- The nondiscrimination language above (**with** initials line) will be appended to any *existing* contracts, purchase orders, and agreements that do not include it, and initialed by the responsible official of the other organization.
- The nondiscrimination language above (**without** initials line) will be incorporated as standard language before the signature page of our standard contracts, purchase orders, and agreements.
- The Title VI Coordinator will review *existing* contracts to ensure the language has been added.

6.2 NONDISCRIMINATION NOTICE TO PROSPECTIVE BIDDERS

The HATS, in accordance with Title VI of the Civil Rights Act of 1964 and related nondiscrimination authorities, and Title 49 Code of Federal Regulations, Parts 21 and 26, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority and women business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, sex, age, creed, limited English proficiency, low-income, or disability in consideration for an award.

Implementation

- The nondiscrimination language above will be included in all solicitations for bids for work or material and proposals for negotiated agreements to assure interested firms that we provide equal opportunity and do not discriminate.
- Outreach efforts will be made to minority and women-owned firms that work in requested fields and documented.
- Unless specifically required under Disadvantaged Business Enterprise (DBE) or Affirmative Action programs, all contractors will be selected without regard to their race, color, national origin, or sex.

7.0 EXTERNAL DISCRIMINATION COMPLAINT PROCEDURES

These discrimination complaint procedures outline the process used by HATS 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 HATS 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, sex, age, national origin, creed (religion) 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:

- **Hoke Area Transit Service 316 Magnolia Street, Raeford, NC 28307**
- **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
- **US Department of Transportation**, Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202-366-4070
Federal Transit Administration, Office of Civil Rights, ATTN: Title VI Program Coordinator, East Bldg. 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590
- **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. **Discrimination Complaint Form** – The Discrimination Complaint Form is consistent with the FTA Certifications & Assurances, "Nondiscrimination Assurance."
6. **Complaint Basis** – Allegations must be based on issues involving race, color, national origin, sex, age, creed (religion) or disability. The term "basis" refers to the complainant's membership in a protected group category.

Protected Categories	Definition	Examples	Applicable Statutes and Regulations
			FTA

Race	An individual belonging to one of the accepted racial groups; or the perception, based usually on physical characteristics that a person is a member of a racial group	Black/African American, Hispanic/Latino, Asian, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, White	Title VI of the Civil Rights Act of 1964; 49 CFR Part 21; 49 U.S.C. 5332(b); FTA Circular 4702.1B
Color	Color of skin, including shade of skin within a racial group	Black, White, brown, yellow, etc.	
National Origin	Place of birth. Citizenship is not a factor. Discrimination based on language or a person's accent is also covered.	Mexican, Cuban, Japanese, Vietnamese, Chinese	
Sex	Gender	Women and Men	49 U.S.C. 5332(b); 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
Creed	Religion.	Muslim, Christian, Hindu, Atheist	49 U.S.C. 5332(b)

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 enough 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 be request the complaints log during pre-grant approval processes).
3. The **Log Year(s)** since the last submittal will be entered (e.g., 2015-2018, 2017-2018, FFY 2018, or 2018) and the complaints log will be signed before submitting the log to NCDOT.
4. When reporting **no complaints**, check the **No Complaints or Lawsuits** box and sign the log.

DISCRIMINATION COMPLAINT FORM

Any person who believes that he/she has been subjected to discrimination based upon race, color, creed, sex, age, national origin, or disability may file a written complaint with Hoke Area Transit Service, within 180 days after the discrimination occurred.																			
Last Name:		First Name:		<input type="checkbox"/> Male <input type="checkbox"/> Female															
Mailing Address:			City	State	Zip														
Home Telephone:	Work Telephone:	E-mail Address																	
Identify the Category of Discrimination: <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> SEX <input type="checkbox"/> CREED (RELIGION) <input type="checkbox"/> DISABILITY <input type="checkbox"/> LIMITED ENGLISH PROFICIENCY <input type="checkbox"/> AGE <small>*NOTE: Title VI bases are race, color, national origin. All other bases are found in the "Nondiscrimination Assurance" of the FTA Certifications & Assurances.</small>																			
Identify the Race of the Complainant <input type="checkbox"/> Black <input type="checkbox"/> White <input type="checkbox"/> Hispanic <input type="checkbox"/> Asian American <input type="checkbox"/> American Indian <input type="checkbox"/> Alaskan Native <input type="checkbox"/> Pacific Islander <input type="checkbox"/> Other _____																			
Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.																			
Names of individuals responsible for the discriminatory action(s):																			
How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional page(s), if necessary).																			
The law prohibits intimidation or retaliation against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.																			
Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: (Attached additional page(s), if necessary).																			
<table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; width: 15%;"><u>Name</u></th> <th style="text-align: left; width: 60%;"><u>Address</u></th> <th style="text-align: left; width: 25%;"><u>Telephone</u></th> </tr> </thead> <tbody> <tr> <td>1. _____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>2. _____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>3. _____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>4. _____</td> <td>_____</td> <td>_____</td> </tr> </tbody> </table>					<u>Name</u>	<u>Address</u>	<u>Telephone</u>	1. _____	_____	_____	2. _____	_____	_____	3. _____	_____	_____	4. _____	_____	_____
<u>Name</u>	<u>Address</u>	<u>Telephone</u>																	
1. _____	_____	_____																	
2. _____	_____	_____																	
3. _____	_____	_____																	
4. _____	_____	_____																	

DISCRIMINATION COMPLAINT FORM

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

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

Have you discussed the complaint with any HATS 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:

Hoke Area Transit Service
Attention: Nancy Thornton
316 Magnolia Street
Raeford, NC 28307
nthornton@hokecouthy.org
910-875-8696

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: NCDOT FTA Date Referred: _____

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 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)
 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 by the RPO 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. Developing 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 issue. A sample investigative report is provided below.

HATS Investigative Report

- I. COMPLAINANT(S) NAME:**
- II. RESPONDENT(S)**
- III. APPLICABLE LAW/REGULATION**
- IV. COMPLAINT BASIS**
- V. ISSUES/ALLEGATIONS**
- VI. BACKGROUND**
- VII. INVESTIGATIVE PROCEDURES**
- VIII. ISSUES/FINDINGS OF FACT**
- IX. CONCLUSION**
- X. RECOMMENDED ACTIONS**

8.0 SERVICE AREA POPULATION CHARACTERISTICS

To ensure that Title VI reporting requirements are met, we will collect and maintain population data on potential and actual beneficiaries of our programs and services. This section contains relevant population data for our overall service area. This data provides context for the Title VI Nondiscrimination Program and will be used to ensure nondiscrimination in public outreach and delivery of our programs and services.

8.1 RACE AND ETHNICITY

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

Race and Ethnicity	Number	Percent
Total Population	52,169	100
White	22,633	43.4
Black or African American	17,343	33.2
American Indian or Alaska Native	3,802	7.3
Asian	801	1.5
Native Hawaiian and Other Pacific Islander	62	.12
Some other Race	3,516	6.7
Two or More Races	4,012	7.7
HISPANIC OR LATINO (of any race)		
Mexican	4,112	7.9
Puerto Rican	1,539	3.0
Cuban	178	.3
Other Hispanic or Latino	1619	3.1

8.2 AGE & SEX

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

Age	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	52,169	25,850	26,319	100%	100%	100%
Under 5 years	4,296	2,216	2,080	8.2	8.6	7.9
Under 18 years	16,490	5,137	4,843	31.6	19.9	18.4
18 to 64 years	32,491	16,017	16,474	62.3	62	63
65 years and over	5,402	2,480	2,922	10.4	10	11.1
Median Age	40.3	38.9	41.8			

8.3 DISABILITY

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

Subject	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-

Total civilian noninstitutionalized population	48,624	+/-505	9,148	+/-736	18.8%	+/-1.5
Population under 5 years	4,296	+/-81	28	+/-44	.7%	+/-1.0
Population 5 to 17 years	16,490	+/-81	999	+/-277	10%	+/-2.8
Population 18 to 64 years	32,491	+/-696	5,520	+/-711	17%	+/-4.7
Population 65 years and over	5,402	+/-262	2,601	+/-354	52.4%	+/-7.1
SEX						
Male	22,790	+/-492	4,555	+/-499	20%	+/-2.2
Female	25,834	+/-214	4,593	+/-385	17.8%	+/-1.5
RACE AND HISPANIC OR LATINO ORIGIN						
White	20,570	+/-608	3,453	+/-440	16.8%	+/-2.1
Black or African American	16,481	+/-652	3,453	+/-437	21%	+/-2.6
American Indian and Alaska Native	3,694	+/-286	934	+/-201	25.3%	+/-5.7
Asian	801	+/-152	103	+/-65	12.9%	+/-8.6
Native American and Other Pacific Islander	62	+/-52	25	+/-31	40.3%	+/-41.3
Some other Race	3,265	+/-589	663	+/-266	20.3%	+/-7.3
Two or more races	3,751	+/-767	517	+/-203	13.8%	+/-4.9
Hispanic or Latino	6,907	+/-194	1,146	+/-295	16.6%	+/-4.7

8.4 POVERTY

The following table was completed using data from Census Table S1701, Poverty Status in the Past 12 Months:	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	50,632	+/-404	9,060	+/-975	17.9%	+/-1.9
AGE						
Under 18	13,868	+/-216	3,178	+/-552	22.9%	+/-3.9
18 to 64	31,552	+/-331	5,225	+/-543	16.6%	+/-1.7
65 years and over	5,212	+/-149	657	+/-186	12.6%	+/-3.5
SEX						
Male	24,626	+/-376	4,023	+/-565	16/3%	+/-2.3
Female	36,006	+/-193	5,037	+/-558	19.4%	+/-2.2
RACE AND HISPANIC OR LATINO ORIGIN						
White	22,140	+/-568	2,783	+/-502	12.6%	+/-2.2
Black or African American	16,581	+/-647	3,406	+/-594	20.5%	+/-3.6
American Indian and Alaska Native	3,694	+/-286	1,067	+/-247	28.9%	+/-6.5
Asian	798	+/-153	28	+/-32	3.5%	-/4.5
Native American and Other Pacific Islander	62	+/-52	22	+/-32	35.5%	+/-40.0
Some other Race	3,452	+/-594	967	+/-399	28%	+/-10.6
Two or more races	3,905	+/-798	787	+/-321	20.2%	+/-7.3
Hispanic or Latino	7,232	+/-149	2035	+/-570	28.1%	+/-7.8
RACE AND HISPANIC OR LATINO ORIGIN						
All individuals below:						
50 percent of poverty level	4,670	+/697				
125 percent of poverty level	11,575	+/-1,193				
150 percent of poverty level	13,140	+/-1,191				
185 percent of poverty level	17,715	+/-1,240				
200 percent of poverty level	19,335	+/-1,401				

8.5 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	Households	
	Estimate	Margin of Error +/-
Total	17,795	+/-335
Less than \$10,000	9.8%	+/-1.5
\$10,000 to \$14,999	6.0%	+/-1.4
\$15,000 to \$24,999	8.2%	+/-1.3
\$25,000 to \$34,999	10.2%	+/-1.7
\$35,000 to \$49,999	12.6%	+/-1.9
\$50,000 to \$74,999	18.9%	+/-2.14
\$75,000 to \$99,999	12.6%	+/-1.8
\$100,000 to \$149,999	11.4%	+/-2.0
\$150,000 to \$199,999	6.1%	+/-1.8
\$200,000 or more	3.7%	+/-1.1
Median income (dollars)	53,456	+/-2,673
Mean income (dollars)	69,242	+/-3,571

8.6 LIMITED ENGLISH PROFICIENCY POPULATIONS

1.	Hoke County, NC	
	Estimate	Margin of Error +/-
Total	47,873	+/-81
Speak only English	42,631	+/-565
Spanish or Spanish Creole:	4,119	+/-449
Speak English "very well"	2,164	+/-276
Speak English less than "very well"	1,537	+/-498

8.7 POPULATION LOCATIONS

Federal-aid recipients 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.

9.0 TITLE VI EQUITY ANALYSIS (AND ENVIRONMENTAL JUSTICE ASSESSMENTS)

Title VI Equity Analysis. In accordance with FTA Circular 4702.1B, a Title VI equity analysis will be conducted whenever we construct a facility, such as a vehicle storage facility, maintenance facility, or operation center. The equity analysis will be conducted during the planning stage, with regard to the location of the facility, to determine if the project could result in a disparate impact to minority communities based on race, color or national origin. Accordingly, we will look at various alternatives before selecting a site for the facility. Project-specific demographic data on potentially affected communities and their involvement in decision-making activities will be documented. Title VI Equity Analyses will remain on file indefinitely, and copies will be provided to NCDOT, upon request, during compliance reviews or complaint investigations.

Environmental Justice Analysis. As required by FTA C 4703.1, environmental justice (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 projects, such as when we construct or modify a facility, and our policies, such as when there will be a change in service, amenities or fares. 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 their 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.

10.0 PUBLIC INVOLVEMENT

10.1 INTRODUCTION

Effective public involvement is a key element in addressing Title VI in decision-making. This **Public Participation Plan** describes how HATS will disseminate vital agency information and engage the public. We will seek out and consider the input and needs of interested parties and groups traditionally underserved by transportation systems who may face challenges accessing our services, such as minority

and limited English proficient (LEP) persons. Underlying these efforts is our commitment to determining the most effective outreach methods for a given project or population.

General public involvement practices will include:

- Expanding traditional outreach methods. Think outside the box: Go to hair salons, barbershops, street fairs, etc.
- Providing for early, frequent and continuous engagement by the public.
- Use of social media and other resources as a way to gain public involvement.
- Coordinating with community- and faith-based organizations such as the Hispanic Liaison, educational institutions, and other entities to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
- Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP persons could also include audio programming available on podcasts.

10.2 PUBLIC NOTIFICATION

Passengers and other interested persons will be informed of their rights under Title VI and related authorities with regard to our program. The primary means of achieving this will be posting and disseminating the policy statement and notice as stipulated in Sections 3.0 and 4.0, respectively. Additional measures may include verbally announcing our obligations and the public's rights at meetings, placing flyers at places frequented by targeted populations, and an equal opportunity tag-on at the end of radio announcements. The method of notification will be determined through an initial screening of the area.

10.3 DISSEMINATION OF INFORMATION

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

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

10.4 MEETINGS AND OUTREACH

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

Public Relations and Outreach

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

- We will seek out and facilitate the involvement of those potentially affected.

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

Public Meetings

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

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

Small Group Meetings

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

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

Community Surveying

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

10.5 LIMITED ENGLISH PROFICIENCY

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 we 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 (population 5 years and over):	47,873	+/- 81	(X)	(X)
Speak only English	42,631	+/- 565	89.1%	
Spanish or Spanish Creole:	4,119	+/- 449	8.6%	
Speak English "very well"	2,164	+/-276	4.5%	
Speak English less than "very well"	1,537	+/-498	3.2%	

Based on census estimates, factoring in margins of error, there is one individual LEP language group within Hoke County that meets the safe harbor threshold, which is Spanish speaking individuals. These individuals are settled throughout Hoke County, generally living outside the town limits of Raeford. Hoke Area Transit Service provides services throughout Hoke County and does not place any limits on the areas within the county that it picks up from. There is a staff member that is bilingual in English and Spanish, and interpreters are available through Hoke County Dept. of Social Services and Health Dept. All advertising is provided in both English and Spanish. In accordance with the USDOT LEP guidance, HATS will provide Title VI related written notice and materials free of cost in Spanish

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

HATS provides rides to approximately 25 LEP persons per year. While formal data has not been collected, the agency has indicated it has encountered approximately 25 LEP persons using the service within the last 6 months.

HATS has an open-door policy and will provide rides to any county resident who requests to do so. If an individual has speech limitations, the office staff or driver will work with office personnel and/or Hoke County DSS and Health Dept., if needed, to ensure the individual receives access to the transportation services.

HATS will distribute a survey once per year in order to gather information from transit riders and the general public regarding the services provided. This information will help HATS determine what they are doing well, and what areas need improvement.

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

Hoke Area Transit Service understands that a person who has a LEP language barrier also faces difficulties obtaining health care, education, and access to employment. A transportation system is a key link to connecting LEP persons to these essential services. HATS provides transportation for residents to and from the following agencies:

- Dept of Social Services
- Health Department
- Department of Aging
- Nutrition Sites
- Adult Day Care
- Senior Centers
- Vocational Rehabilitation
- Community College

HATS has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include having emergency evacuation procedures posted in our facilities and in the transit vehicles and providing information to the public on security awareness and emergency preparedness. Information can also be distributed via public television and radio broadcasts. HATS is an integral part of the Hoke County Emergency Operations Plan and is actively involved with Hoke County Emergency Services whose staff disseminates information to the general public, in both English and Spanish.

HATS's assessment of what programs, activities, and services that are most critical include contact with community organizations such as Hoke County Dept. of Social Services & Health Dept., Sandhills Community College, and churches throughout Hoke County that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to LEP populations. Brochures that explain the services that are provided have been distributed to these agencies and are written in both the English and Spanish language.

In order to help HATS understand the significance of our program to our community, the following questions are included on the survey that has been previously mentioned. Surveys are also completed via telephone, and a translator is available for those who speak limited English.

- Is HATS important to you?
- Do you have other means of transportation?
- Does using HATS services help you financially?

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

HATS makes every reasonable effort to communicate with LEP persons about available transit services, including providing the funding for translation of current services and bilingual materials and pay for

Language Line services, as needed. As resources permit, HATS will include training for all drivers on best practices for serving LEP individuals.

HATS works with Hoke County Social Services and Health Department to gain insight regarding the needs and concerns of LEP persons about local transit services. HATS is continually exploring options for the best methods of delivering information and meeting the transit needs of all LEP persons and Hoke County residents.

LANGUAGE ASSISTANCE PLAN

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

Language Assistance Measures

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

- Translating public notices posted in the local paper and at stations, stops, and in vehicles into **any languages that meet the safe harbor threshold in Factor 1**.
- Vital documents—such as brochures with service times and routes—are translated into Spanish across the entire service area, and available in our facilities, doctor's offices and shopping centers.
- Making a concerted effort to inform LEP persons of available language assistance via staff, broadcast media, relationship-building with organizations, and our website.
- Posting vital bulletin board information and disseminating community surveys in various languages.
- Providing translation and interpretive services when appropriate (upon request or predetermined) at meetings.
- Determining how best to take public involvement to LEP groups directly, including through small group meetings.
- Where possible, utilizing or hiring staff who speak a language other than English and can provide competent language assistance.
 - Note: We will not ask community-based organizations (CBO) to provide, or serve as, interpreters at our meetings. Relying upon CBOs in that capacity could raise ethical concerns. If a CBO decides (on its own) to translate any materials for its constituents, or bring interpreters it trusts to our meetings, we will not object. That is their right.
- Using language identification flashcards to determine appropriate services.
- Establishing a process to obtain feedback on our language assistance measures.
 - Spanish: When written interpretation/translation is needed, HATS staff may contact an interpreter at either Hoke County Health Department or Hoke County Department of Social Services for assistance. All HATS legal notices, public notices, and agency brochures are printed in both English and Spanish. HATS brochures are distributed throughout the county to local agencies such as Hoke County Health Department, Hoke County Social Services, Sandhills Community

College, and other area businesses. Currently, HATS receives referrals for LEP persons from the Hoke County Health Department and Hoke County Social Services for transit assistance.

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

- Agency staff will be provided a list of referral resources that can assist LEP persons with written translation and oral interpretation, including the Title VI Officer. This list will be updated as needed to remain current.
- All main offices and vehicles will have on hand a supply of language assistance flashcards and materials translated into the languages of the largest LEP language groups. When encountered by an LEP person, staff (including drivers) should present the individual with an iSpeak flashcard and let them choose the language. Do not assume you know their preferred language. Drivers are permitted to seek volunteer assistance from other passengers 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 (Section 5.0) and basic Title VI training (Section 11.0).

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 LAP

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.

10.6 DEMOGRAPHIC REQUEST

The following form was used to collect required data on Key Community Contacts and non elected committee members.

Hoke Area Transit Service is required by Title VI of the Civil Rights Act of 1964 and related authorities to record demographic information on members of its boards and committees. Please provide the following information:

<p>Race/Ethnicity:</p> <input type="checkbox"/> White <input type="checkbox"/> Black/African American <input type="checkbox"/> Asian <input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Native Hawaiian/Pacific Islander <input type="checkbox"/> Hispanic/Latino <input type="checkbox"/> Other (please specify): _____	<p>National Origin: (if born outside the U.S.)</p> <input type="checkbox"/> Mexican <input type="checkbox"/> Central American: _____ <input type="checkbox"/> South American: _____ <input type="checkbox"/> Puerto Rican <input type="checkbox"/> Chinese <input type="checkbox"/> Vietnamese <input type="checkbox"/> Korean <input type="checkbox"/> Other (please specify): _____
<p>Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female</p>	<p>Age:</p> <input type="checkbox"/> Less than 18 <input type="checkbox"/> 45-64 <input type="checkbox"/> 18-29 <input type="checkbox"/> 65 and older <input type="checkbox"/> 30-44
<p>Disability: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>I choose not to provide any of the information requested above: <input type="checkbox"/></p>	

Completed forms will remain on file as part of the public record. For more information regarding Title VI or this request, please contact the Hoke Area Transit Service at 910-299-0127 or by email at nthornton@hokecouty.org.

Please sign below acknowledging that you have completed this form.

Thank you for your participation!

Name (print): _____

Signature: _____

Implementation

- Forms will be completed prior to NCDOT Title VI reviews and remain on file for three years.
- All new and existing members of appointed decision-making boards or committees will be **required** to complete this form for reporting purposes.
- If a member, for whatever reason, selects "I choose not to provide any of the information requested above," this will be accepted as a **completed** form.
- If a member chooses not to provide any of the information on the form, the Title VI Coordinator will be permitted to indicate that member's race and gender, based on the Coordinator's best guess.
- Data from these forms will be used to complete the Demographic Request Table.

- Once a new member submits this form, the Demographic Request Table for the associated committee will be updated.

10.7 KEY COMMUNITY CONTACTS

Contact Name	Community Name	Interest or Affiliation	Also a Committee Member? (Y/N)
Tony Hunt	Hoke County Commissioner	Elected Official	Yes
Mary Hollingsworth	Hoke County Senior Services	All County Residents	Yes
Bryan Marley	Hoke County Emergency Services	All County Residents	Yes
Rosa Chavis	Children's Development Center	All county residents	Yes
Leticia Edens	Hoke County Manager	All county residents	Yes
Genia Hunt	Hoke County Health Dept.	All county residents	Yes
Tammy Chaney	Hoke County Dept Of Social Services	All county residents	Yes
Cathy James	Hoke County Agricultural Dept	All county residents	Yes
Robin Crowell	Da Vita Dialysis	All county residents	Yes
Bruce Hurst	Monarch Vocational Options	All county residents	Yes
Mary Miles	General Public Representative	All county residents	Yes

Contact information for key community contacts is not public information and is maintained outside of this document. Any staff member who wishes to contact any individual listed above must request that information from the Title VI Coordinator.

10.8 SUMMARY OF OUTREACH EFFORTS MADE SINCE THE LAST TITLE VI PROGRAM SUBMISSION

The following format is used to document HATS's outreach efforts in reports to NCDOT. All meetings and disseminations of information capture information for the table below:

Meeting Date	Meeting Time	Meeting Purpose	Target Audience	Information Disseminated
3rd Wednesday of the following months: December, February, April, June	10:00 am	Transit Advisory Board Meeting	General Public, any persons interested in the services available through HATS	Information varies based on current events relevant to HATS, the Board, and public comments/input/recommendations

11.0 STAFF 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. Training 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 training, such as agendas, sign-in sheets, copies of calendars, and certificates, will remain on file for at least three years (and in personnel files).

12.0 NON ELECTED BOARDS AND COMMITTEES – BY RACE AND GENDER

The table below depicts race and gender compositions for each of our nonelected (appointed) decision-making bodies. Member names and full demographics for each committee are available, upon request.

Body	Male %	Female %	Caucasian %	African American %	Asian American %	Native American %	Other %	Hispanic %
Service Area Population	49.5	50.4	42.3	33.9	1.6	7.6	14.6	14.2
Transit Advisory Board	27	73	18	55	0	18	12.5	

Strategies for Representative Committees

Diversification goals will be provided to our non-elected boards and committees to help ensure that their membership mirrors our service area demographics, as adequately as possible. We will provide periodic updates on our outreach efforts at meetings. When there is an opening on a board or committee, we will ensure the following:

- Current members will be made aware of diversity goals and polled for nominees.
- Officials from local minority groups will be made aware of the diversity goals and polled for nominees.
- Key Contacts from LEP groups will be contacted and polled for nominees.
- A recruitment notice for a Board Member opening will be posted on our website.
- An advertisement of recruitment notice for a Board Member will be placed with the local newspaper and other publications popular with minorities and other protected groups.

13.0 RECORD-KEEPING AND REPORTS

As a subrecipient of FTA funds through NCDOT, we are required to submit a Title VI Program update to NCDOT every three years, on a schedule determined by NCDOT. Records will be kept to document compliance with the requirements of the Title VI Program. Unless otherwise specified, Title VI-related records shall be retained indefinitely. These records will be made available for inspection by authorized officials of the NCDOT and/or FTA. Reports on Title VI-related activities and progress to address findings identified during Title VI compliance reviews may also be provided, upon request. It will occasionally be necessary to update this Title VI Plan or any of its components (e.g., complaints, Public Involvement, and LEP). Updates will be submitted to NCDOT for review and approval and adopted by our Board when required.

In addition to items documented throughout this Plan, records and reports due at the time of compliance reviews or investigations may include:

Compliance Reviews

- Title VI Program Plan
- List of civil rights trainings provided or received

- Summaries from any *internal* reviews conducted
- Ads and notices for specific meetings

- Findings from reviews by any other *external* agencies
- Title VI equity analyses and EJ assessments
- Discrimination Complaints Log

Complaint Investigations

- Investigative Reports
- Discrimination complaint, as filed
- List of interviewees (names and affiliations)

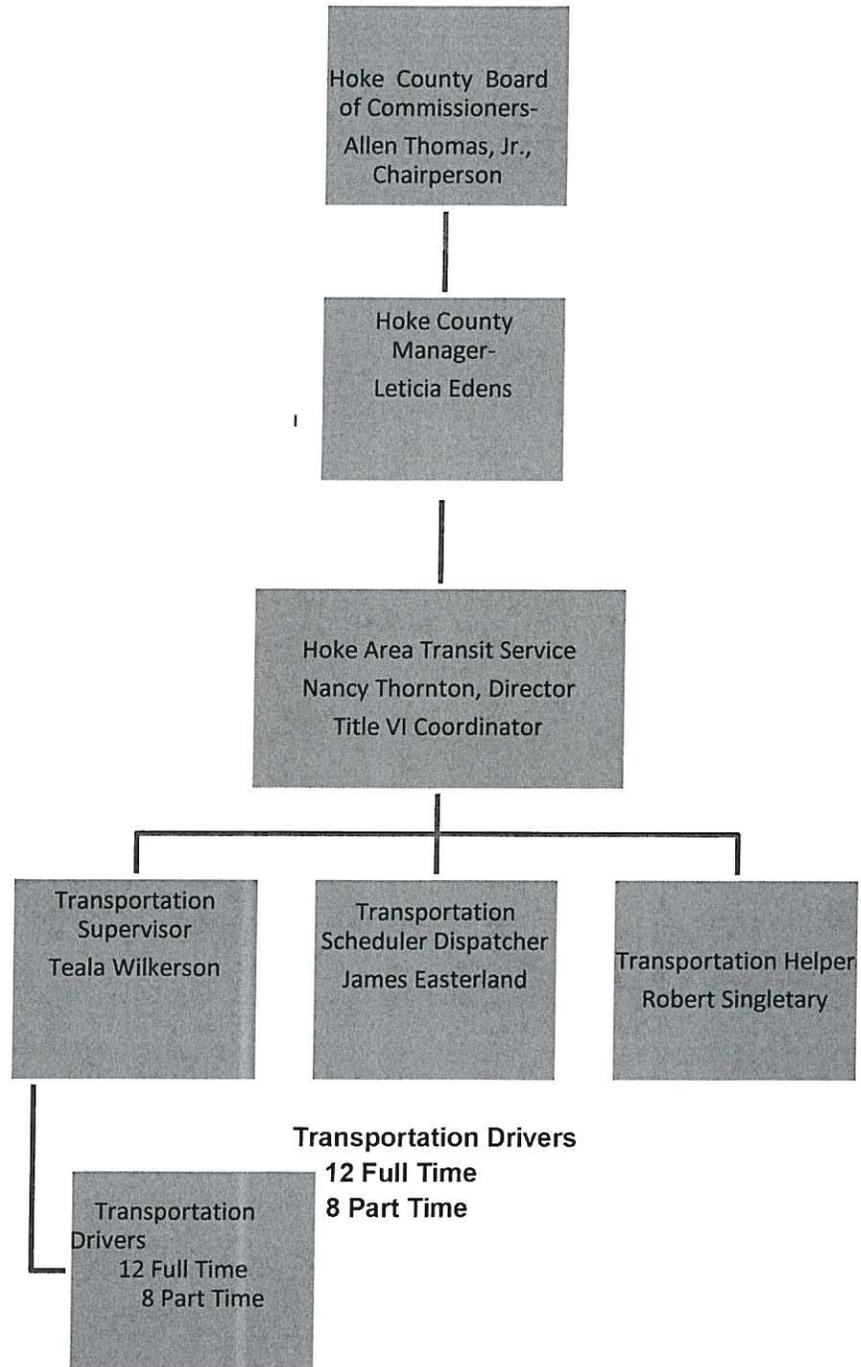
- Supporting Documentation (e.g., requested items, photos taken, dates and methods of contact, etc.)

Appendix A Applicable Nondiscrimination Authorities

During the implementation of this Title VI Program, the organization, for itself, its assignees and successors in interest, is reminded that it has agreed to comply with the following non-discrimination statutes and authorities, including but not limited to:

- 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);
- 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);
- 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;
- 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.*).
- Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e *et seq.*, Pub. L. 88-352), (prohibits employment discrimination on the basis of race, color, creed (religion), sex, or national origin);
- 49 CFR Part 26, regulation to ensure nondiscrimination in the award and administration of DOT-assisted contracts in the Department's highway, transit, and airport financial assistance programs;
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination 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);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq.*), (prohibits discrimination on the basis of sex);
- Airport and Airway Improvement Act of 1982, (49 USC § 4 71, Section 4 7123), as amended, (prohibits discrimination based on race, creed (religion), color, national origin, or sex);
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Federal transit laws, specifically 49 U.S.C. § 5332 (prohibiting discrimination based on race, color, religion, national origin, sex (including gender identity), disability, age, employment, or business opportunity).

Appendix B-Organizational Chart



Appendix C
NCDOT's Compliance Review Checklist for Transit

I. Program Administration (General Requirements)

Requirement: FTA C 4702.1B – Title VI Requirements and Guidelines for FTA Recipients, Chapter III – General Requirements and Guidelines.

Note: Every NCDOT subrecipient receiving any of the FTA Formula Grants listed above must complete this section.

Requested Items (Please attach electronic documents (.pdf, .doc, etc.) or provide links to online versions)	Completed
1. A copy of the recipient's <i>signed</i> NCDOT's Title VI Nondiscrimination Agreement	<input type="checkbox"/>
2. Title VI Policy Statement (<i>signed</i>)	<input type="checkbox"/>
3. Title VI Notice to the Public, including a list of locations where the notice is posted	<input type="checkbox"/>
4. Type the name and title of your Title VI Coordinator and attach a list of their Title VI duties Name/Title:	<input type="checkbox"/>
5. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)	<input type="checkbox"/>
6. Title VI Complaint Form	<input type="checkbox"/>
7. List of transit-related Title VI investigations, complaints, and lawsuits (i.e., discrimination complaints log)	<input type="checkbox"/>
8. Public Participation Plan, including information about outreach methods to engage traditionally underserved constituencies (e.g., minorities, limited English proficient populations (LEP), low-income, disabled), as well as a summary of outreach efforts made since the last Title VI Program submission	<input type="checkbox"/>
9. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance, which requires conducting four-factor analyses	<input type="checkbox"/>
10. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees	<input type="checkbox"/>
11. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program	<input type="checkbox"/>
12. A description of the procedures the agency uses to ensure nondiscriminatory administration of programs and services	<input type="checkbox"/>

18. Service policies (**system-wide policies**) adopted to ensure that service design and operations practices do not result in discrimination on the basis of race, color or national origin, must be submitted for each of the following:

- Transit amenities for each mode (*e.g., benches, shelters/canopies, printed materials, escalators/elevators, and waste receptacles. NOTE: Attach this information only if you have decision-making authority over siting transit amenities or you set policies to determine the siting of amenities.*)
- Vehicle assignment for each mode (*Refers to the process by which transit vehicles are placed into service throughout a system. Policies for vehicle assignment may be based on the type or age of the vehicle, where age would be a proxy for condition, or on the type of service offered.*)

Nancy Thornton

From: Mikkelsen, Shirley A <samikkelsen@ncdot.gov>
Sent: Wednesday, July 12, 2023 4:53 PM
To: Nancy Thornton
Subject: RE: [External] Re: Hoke (HATS) Signed Title VI Policy

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you!

From: Nancy Thornton <nthornton@hokecounty.org>
Sent: Wednesday, July 12, 2023 4:46 PM
To: Mikkelsen, Shirley A <samikkelsen@ncdot.gov>
Subject: [External] Re: Hoke (HATS) Signed Title VI Policy

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Yes ma'am

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From: Mikkelsen, Shirley A <samikkelsen@ncdot.gov>
Sent: Wednesday, July 12, 2023 4:44:08 PM
To: Nancy Thornton <nthornton@hokecounty.org>
Subject: RE: Hoke (HATS) Signed Title VI Policy

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Nancy,

Please disregard the requested Title VI policy corrections made today by Vashon Canty for Hoke. Vashon is new to OCR and still in training, sorry about that.

- Disregard: pg. 14. Please have them add their initials and date to the Contract Administration page. [no initial and date] as this is a template in the policy that does not require to be initialed or dated).

Shirley A. Mikkelsen

Garner, NC 27529

Mailing Address:
1511 Mail Service Center Drive
Raleigh, North Carolina 27699-1511



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From: Mikkelsen, Shirley A <samikkelsen@ncdot.gov>
Sent: Monday, July 10, 2023 9:52 AM
To: Canty, Vashon N <vncanty@ncdot.gov>
Subject: Hoke (HATS) Signed Title VI Policy

Good Morning!

Attached is the HOKE Signed (6/20/23) Title VI Policy.

Shirley A. Mikkelsen

From: Nancy Thornton <nthornton@hokecounty.org>
Sent: Friday, July 7, 2023 4:07 PM
To: Mikkelsen, Shirley A <samikkelsen@ncdot.gov>
Subject: RE: [External] Re: HATS Title VI Policy past due of concern

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Hi Shirley,

I have attached the FY23 HATS Title VI Policy which I received today. I'm extremely sorry it as taken so long. I truly appreciate your patience during this process. We truly appreciate all that you do for Public Transportation. I hope you have a great rest of your day and weekend!

Thanks,
Nancy

From: Mikkelsen, Shirley A <samikkelsen@ncdot.gov>
Sent: Thursday, June 22, 2023 11:20 AM
To: Nancy Thornton <nthornton@hokecounty.org>
Subject: RE: [External] Re: HATS Title VI Policy past due of concern

From: Nancy Thornton <nthornton@hokecounty.org>
Sent: Sunday, June 11, 2023 11:38 PM
To: Mikkelsen, Shirley A <samikkelsen@ncdot.gov>
Subject: Re: [External] Re: HATS Title VI Policy past due of concern

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Good morning Shirley,

The Hoke County Attorney approved it today at 5:20pm. I have requested to be on the June 20, 2023 BOC agenda. I can forward every email that I have sent since 5/1/23 to request it on the BOC agendas. I'm truly sorry for the delay but I have no control with this matter unfortunately. Every email I had stressed the importance of this policy being approved. I truly appreciate your patience. I hope you have a wonderful day!

Thanks,
Nancy

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From: Mikkelsen, Shirley A <samikkelsen@ncdot.gov>
Sent: Thursday, June 8, 2023 3:24:18 PM
To: Nancy Thornton <nthornton@hokecounty.org>
Subject: RE: [External] Re: HATS Title VI Policy past due of concern

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Nancy,

Was the HATS Title VI policy signed by the governing board member at the BOC 6/5/2023 meeting?

Please and thank you.

Shirley A. Mikkelsen

From: Nancy Thornton <nthornton@hokecounty.org>
Sent: Wednesday, May 24, 2023 2:13 PM
To: Mikkelsen, Shirley A <samikkelsen@ncdot.gov>
Subject: Re: [External] Re: HATS Title VI Policy past due of concern

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You're very welcome!

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Please ensure the Title VI policy is approved and signed by the governing board member at the next BOC agenda 6/5/2023.

Please and thank you.

Shirley A. Mikkelsen

From: Nancy Thornton <nthornton@hokecounty.org>
Sent: Tuesday, May 23, 2023 5:24 PM
To: Mikkelsen, Shirley A <samikkelsen@ncdot.gov>
Subject: [External] FW: HATS Title VI Policy

CAUTION: External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

Hi Shirley,

This was sent on May 1st! I have sent another email to him on 5/15/2023 again. I have express the importance of this but I haven't received a response as of yet. I'm hoping it will be approved for the next BOC agenda 6/5/2023. I hope you have a great evening!

Thanks,
Nancy

From: Nancy Thornton
Sent: Monday, May 1, 2023 10:52 AM
To: gradyh@huntbrookslaw.com; Gwen Mcgougan <gmcgougan@hokecounty.org>
Subject: HATS Title VI Policy

Good Morning,

I have attached the FY23 Title VI Policy for HATS. It has been reviewed and approved by the NCDOT Office of Civil Rights/Title VI Program. Mr. Hunt if you could please review and Approve for the BOC agenda for Monday, May 15, 2023 I would really appreciate it? When it is approved by the BOC I will need to send a signed copy back to the NCDOT Title VI Program office. We truly appreciate all that you all do for Public Transportation. I hope you have a great rest of your day.

Thanks,
Nancy

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Email correspondence to and from this sender is subject to the N.C. Public Records Law and may be disclosed to third parties.

Nancy Thornton

From: Grady Hunt <gradyh@huntbrookslaw.com>
Sent: Sunday, June 11, 2023 4:56 PM
To: Nancy Thornton
Cc: gradyh@huntbrookslaw.com
Subject: RE: HATS Title VI Policy

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Nancy,

Good afternoon. I am including the language to NCGS 159-28(a1) below. Basically, any written contract or agreement that requires Hoke County to pay money should include a preaudit certificate. A sample certificate is below. Please make sure our vendors include this in all agreements.

Grady

NCGS 159-28(a1) Preaudit Requirement. - If an obligation is reduced to a written contract or written agreement requiring the payment of money, or is evidenced by a written purchase order for supplies and materials, the written contract, agreement, or purchase order shall include on its face a certificate stating that the instrument has been preaudited to assure compliance with subsection (a) of this section. The certificate, which shall be signed by the finance officer, or any deputy finance officer approved for this purpose by the governing board, shall take substantially the following form:

"This instrument has been preaudited in the manner required by the Local Government Budget and Fiscal Control Act.

(Signature of finance officer)."



HUNT & BROOKS

Grady L. Hunt
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gradyh@huntbrookslaw.com

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Could you please let me know when you have reviewed and approved the Title VI policy for the BOC agenda? I need it to be returned to NCDOT so it does not interfere with our FY24 grants contracts that are supposed to be released in July 2024. I hope you had a wonderful birthday! Happy belated birthday. We truly appreciate all that you do for Public Transportation. Have a great rest of your evening!

Thanks,
Nancy

From: Nancy Thornton
Sent: Monday, May 1, 2023 10:52 AM
To: gradyh@huntbrookslaw.com; Gwen Mcgougan <gmcgougan@hokecounty.org>
Subject: HATS Title VI Policy

Good Morning,

I have attached the FY23 Title VI Policy for HATS. It has been reviewed and approved by the NCDOT Office of Civil Rights/Title VI Program. Mr. Hunt if you could please review and Approve for the BOC agenda for Monday, May 15, 2023 I would really appreciate it? When it is approved by the BOC I will need to send a signed copy back to the NCDOT Title VI Program office. We truly appreciate all that you all do for Public Transportation. I hope you have a great rest of your day.

Thanks,
Nancy