



Title VI Program Plan

Date of Adoption: January 10, 2024

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TITLE VI PLAN REVIEW AND ADOPTION

On behalf of the Central Carolina Community College Foundation board, I hereby acknowledge receipt of the Title VI Nondiscrimination Plan. We, the Central Carolina Community College Foundation board, 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 Central Carolina Community College Foundation 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.

Emily Hare

Emily Hare, CCCC Foundation President

2024-01-10

DATE

TITLE VI NONDISCRIMINATION AGREEMENT

BETWEEN

THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION

AND

CENTRAL CAROLINA COMMUNITY COLLEGE FOUNDATION

In accordance with DOT Order 1050.2A, Central Carolina Community College Foundation 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 Central Carolina Community College Foundation.

Further, Central Carolina Community College Foundation Hereby agrees to:

1. Designate a Title VI Coordinator that has a responsible position within the organization and easy access to the Chief Administrative Officer (CAO, or head) of the organization.
2. Issue a policy statement, signed by the CAO 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 CAO.
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.

Emily Hare

Authorized Signature

2024-01-10

Date

Emily Hare
CCCC Foundation, President

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](#)).

Central Carolina Community College Foundation is a recipient of Federal Transit Administration (FTA) funds from the North Carolina Department of Transportation (NCDOT). Central Carolina Community College Foundation 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 Central Carolina Community College Foundation, 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 OVERVIEW OF SERVICES

Central Carolina Community College Foundation provides transportation services to students who meet eligibility requirements. Eligible students include elderly students aged 65 or older and disabled students enrolled in the College Career and Readiness programs. Central Carolina Community College has established transportation contracts with two providers: the County of Lee Transit System (COLTS) and the Chatham Transit Network (CTN). These transportation companies offer eligible students rides to and from their place of residence on scheduled class dates, with charges based on a per-ride fee structure. During the current fiscal year (FY 23-24), COLTS charges a flat fee of \$10.50 per ride, while CTN charges a flat fee of \$20 per ride. At the end of each month, both COLTS and CTN invoice the Central Carolina Community College Foundation for eligible students' rides. This ensures that students can access transportation services to and from college without any financial burden.

Central Carolina Community College's staff plays a crucial role in identifying students' English proficiency levels during the intake and registration process. During the intake and registration process, students are informed about the transportation services available, particularly for elderly and disabled students. Fifty percent of Central Carolina Community College staff members who work with this student population are bilingual, and proficient in both English and Spanish, enabling effective communication and support for students with limited English proficiency.

Students engage with the contracted transportation service twice a day on days when they have scheduled classes. The transportation process involves picking up students at their residences and ensuring they reach Central Carolina Community College on time for their scheduled classes. Subsequently, after the conclusion of their classes, students are transported safely back to their places of residence.

Fall Schedule classes (August to December 2023) by Campus:

Chatham County		
Location	Program	Walk- In Registration
Siler City Center Front Desk 400 Progress Boulevard Siler City, NC 27344-3032	Adult High School & High School Equivalency Diploma (GED/HiSET)	Wednesday: 9:00 am to 1:00 pm and 2:00 pm to 6:00 pm Fridays: 9:00 am
Siler City Center Front Desk 400 Progress Boulevard Siler City, NC 27344-3032	Adult ESL	Monday, Tuesday, & Wednesday: 9:00 am to 1:00 pm and 2:00 pm to 6:00 pm Thursday: 9:00 am to 2:00 pm Fridays: at 9:00 am

Harnett County		
Location	Program	Walk- In Registration
Harnett Main Campus Continuing Education Bldg-Room 241 1075 E Cornelius Harnett Blvd Lillington, NC 27546	Adult High School & High School Equivalency Diploma (GED/HiSET) & Adult ESL	Monday: 8:30 am Tuesday: 8:30 am or 12:30 pm or 6:00 pm Friday: 8:30 am
West Harnett Center Room 102 145 Olive Farm Drive Sanford, NC 27332	Adult ESL	Monday, Tuesday: 8:30 a.m. - 12:30 p.m.

Lee County		
Location	Program	Walk- In Registration
Center for Workforce Innovation Pod A 5910 Enterprise Park Dr. Sanford, NC 27330	Adult High School & High School Equivalency Diploma (GED/HiSET)	Tuesday: 9:00 am or 2:00 pm Friday: 9:00 am
Center for Workforce Innovation- CWI Pod A 5910 Enterprise Park Dr. Sanford, NC 27330	Adult ESL	Monday through Thursday: 9:00 am to 12:00 pm
Lee Main Campus Wilkinson Hall 1105 Kelly Dr. Sanford, NC 27330-9840	Adult High School & High School Equivalency Diploma (GED/HiSET) & Adult ESL	Tuesday: 6:00 p.m.

Additionally, students can call Central Carolina Community College's information line at (910) 814-8900 for assistance with coordinating transportation. The information line also offers bilingual services (English/Spanish) for students that can assist LEP students and coordinate transportation services.

We utilize 5310 Funding to finance eligible students' transportation rides to and from Central Carolina Community College and their residences. 5310 funding ensures that students have consistent access to the program, removing transportation-related barriers and allowing them to fully participate in their educational pursuits.

3.0 TITLE VI NONDISCRIMINATION POLICY STATEMENT

It is the policy of Central Carolina Community College Foundation, 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.

Emily Hare

Emily Hare, CCCC Foundation President

2024-01-10

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

4.0 NOTICE OF NONDISCRIMINATION

- Central Carolina Community College Foundation 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 the Central Carolina Community College Foundation.
- For more information on the organization’s civil rights program and the procedures to file a complaint, contact the Title VI representatives:

Kevin Pearson, Dean of College Access Services	Jessica Gonzalez, Director of Human Resources Phone- 919-718-7089
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Phone- 919-718-7386 Email- kpearson@cccc.edu Mail: 1105 Kelly Drive, Sanford, NC 27330	Email- jgonz257@cccc.edu Mail: 1105 Kelly Drive, Sanford, NC 27330
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- If information is needed in another language, contact (910)814-8900.
- 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.

Implementation

- The notice will be posted in its entirety on our website and in any documents and reports we distribute.
- Content regarding the program on social media or in other publications shall read: “Organization operates without regard to **race, color, national origin, sex, creed (religion), age or disability**. For more information on Organization’s Title VI program or how to file a discrimination complaint, please contact Kevin Pearson, Dean of College Access Services by phone at (919)718-7386 or email at kpearson@cccc.edu and Jessica Gonzalez, Director of Human Resources, by phone at (919)718-7386 or email at jgonz257@cccc.edu”.
- The statement will be posted or provided in languages other than English when appropriate.

5.0 PROCEDURES TO ENSURE NONDISCRIMINATORY ADMINISTRATION OF PROGRAMS AND SERVICES

We are committed to nondiscriminatory administration of our programs and services, organization wide. Central Carolina Community College Foundation will remind employees of Title VI nondiscrimination obligations through staff training and use of the **Annual Education and Acknowledgement 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 Agency 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 to the following Title VI representatives:

Kevin Pearson, Dean of College Access Services Phone- 919-718-7386 Email- kpearson@cccc.edu Mail: 1105 Kelly Drive, Sanford, NC 27330	Jessica Gonzalez, Director of Human Resources Phone- 919-718-7089 Email- jgonz257@cccc.edu Mail: 1105 Kelly Drive, Sanford, NC 27330
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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 Agency'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 Agency'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.

Emily Hare

Emily Hare, CCCC Foundation President

2024-01-10

Date

Implementation

- Periodically, but not more than once a year, designated employees and representatives will receive, review and certify commitment to the Title VI Program.
- Designated 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

Central Carolina Community College Foundation 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. Central Carolina Community College Foundation 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.

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) cancelling, terminating, or suspending a contract, in whole or in part.

(6) Incorporation of Provisions: The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will act 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 a standard language before the signature page of our standard contracts, purchase orders, and agreements.
- The Staff Attorney will review *existing* contracts to ensure the language has been added.

6.0 DISCRIMINATION COMPLAINT PROCEDURES

These discrimination complaint procedures outline the process used by Central Carolina Community College Foundation 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 Central Carolina Community College Foundation 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 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:

- **Central Carolina Community College Foundation and Title VI Representatives,**

Kevin Pearson, Dean of College Access Services Phone- 919-718-7386 Email- kpearson@cccc.edu Mail: 1105 Kelly Drive, Sanford, NC 27330	Jessica Gonzalez, Director of Human Resources Phone- 919-718-7089 Email- jgonz257@cccc.edu Mail: 1105 Kelly Drive, Sanford, NC 27330
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- **North Carolina Department of Transportation**, Office of Civil Rights, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 984-236-1200
- **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 Central Carolina Community College Foundation, within 180 days after the discrimination occurred.				
Last Name:		First Name:		☐ Male ☐ Female
Mailing Address:		City	State	Zip
Home Telephone:	Work Telephone:	E-mail Address		
Identify the Category of Discrimination: ☐ RACE ☐ COLOR ☐ NATIONAL ORIGIN ☐ SEX ☐ CREED (RELIGION) ☐ DISABILITY ☐ LIMITED ENGLISH PROFICIENCY ☐ AGE *NOTE: Title VI bases are race, color, national origin. All other bases are found in the "Nondiscrimination Assurance" of the FTA Certifications & Assurances.				
Identify the Race of the Complainant ☐ Black ☐ White ☐ Hispanic ☐ Asian American ☐ American Indian ☐ Alaskan Native ☐ Pacific Islander ☐ Other _____				
Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.				
Names of individuals responsible for the discriminatory action(s):				
How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional page(s), if necessary).				
The law prohibits intimidation or retaliation against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.				

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

	<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 Central Carolina Community College Foundation 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:

Kevin Pearson, Dean of
College Access Services
Phone- 919-718-7386
Email- kpearson@cccc.edu
Mail: 1105 Kelly Drive, Sanford,
NC 27330

Jessica Gonzalez, Director of Human
Resources
Phone- 919-718-7089
Email- jgonz257@cccc.edu
Mail: 1105 Kelly Drive, Sanford,
NC 27330

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: ☐ NCDOT ☐ FTA Date Referred: _____

DISCRIMINATION COMPLAINTS LOG

Log Year(s):

CASE NO.	COMPLAINANT NAME	RACE/ GENDER	RESPONDEN T NAME	BASIS	DATE FILED	DATE RECEIVE D	ACTION TAKEN	DATE INVESTIG. COMPLETED	DISPOSITION

No Complaints or Lawsuits ☒

I certify that to the best of my knowledge, the above described complaints or lawsuits alleging discrimination, or **no complaints or lawsuits** alleging discrimination, have been filed with or against **Central Carolina Community College Foundation** since the previous Title VI Program submission to NCDOT.

Emily Hare

Signature of Title VI Coordinator or Other Authorized Official

Emily Hare, CCCC Foundation President

Print Name and Title of Authorized Official

2024-01-10

Date

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.

TEMPLATE/SAMPLE Investigative Report

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

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

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

IV. COMPLAINT BASIS(ES)
[For example, Race, Color, National Origin, Creed (Religion), Sex, Age, Disability)]

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

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

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

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

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

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

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

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

7.0 TITLE VI EQUITY ANALYSIS AND ENVIRONMENTAL JUSTICE ASSESSMENTS

Title VI Equity Analyses. 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 Analyses. 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.

8.0 PUBLIC INVOLVEMENT

8.1 Public Participation Plan

Central Carolina Community College Foundation is committed to fostering inclusivity and ensuring equal opportunities for Limited English Proficiency (LEP) individuals within our community. In pursuing this commitment, the CCCC Foundation actively engages with the public by organizing a comprehensive public participation plan tailored for LEP persons. Before applying for a 5310 NCDOT grant, the CCCC Foundation conducts a public hearing, providing a platform for community members to voice their concerns and opinions.

To reach a wider audience, pertinent information regarding the public hearing and details about the grant and its implications is disseminated through various channels. These include announcements in the Sanford Herald newspaper, updates on the official Central Carolina Community College website, and posts on our social media pages. Recognizing the diverse linguistic landscape of our community, all information is made available in both English and Spanish, ensuring that language barriers do not hinder anyone from participating.

Furthermore, the CCCC Foundation takes proactive steps to inform LEP individuals about the services offered through our career and readiness programs. This information is readily accessible on our dedicated website, providing comprehensive details about the support available.

8.2 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.*

Lee County				
LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
Total (population 5 years and over):	58,704	±45	100%	(X)
Speak only English	48,119	±475	82%	±0.8%
Spanish	9,765	±420	17%	±0.7%
Speak English "very well"	54491	±495	93%	±0.8%
Speak English less than "very well"	4213	±484	7%	±0.8%
Chatham County				
LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
Total (population 5 years and over):	71601	±48	100%	(X)
Speak only English	61231	±776	86%	±1.1%
Spanish	8412	±578	12%	±0.8%
Speak English "very well"	67687	±410	95%	±0.6%
Speak English less than "very well"	3914	±404	6%	±0.6%
Harnett County				
LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error

Total (population 5 years and over):	123491	±7	100%	(X)
Speak only English	109186	±765	88%	±0.6%
Spanish	11561	±655	9.4%	±0.5%
Speak English "very well"	119297	±479	97%	±0.4%
Speak English less than "very well"	4194	±480	3%	±0.4%

The US Census data indicate that the total population within Lee County is 58,704. 17% of Lee County's population that is 5 years and older speaks Spanish at home. In addition, 7% of the population speak English less than "very well". The total LEP for Lee County is 13,978 which includes 9,765 (Spanish speakers) plus 4,213 (Speak English less than "very well") which make up 24% of the Lee County's population. In comparison, the LEP for Chatham County could not be determined. For Chatham County the total population is 71,601 and LEP population is 12,326 of which 8,412 (Spanish speakers) and 3,914 (Speak English less than "very well"). The total LEP for Chatham county makes up about 18% of the total population. For Harnett county total population is 123,491 with a total LEP population of 15,755 of which 11,561 (Spanish speakers) + 4,194 (Speak English less than "very well"). The LEP population makes up about 13% of the total population.

The first factor identifies Spanish as the most significant language spoken by the LEP population in the service area.

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

Central Carolina Community College Foundation provides transportation services to students who meet eligibility requirements, including elderly students aged 65 or older and disabled students enrolled in the College Career and Readiness programs. CCCC has established transportation contracts with two providers: the County of Lee Transit System (COLTS) and the Chatham Transit Network (CTN). These transportation companies offer eligible students rides to and from their place of residence on scheduled class dates, with charges based on a per-ride fee structure.

As part of our commitment to serving LEP individuals, our staff plays a crucial role in identifying LEP students during the intake and registration process. These students are informed about the transportation services available, particularly for elderly and disabled students. Fifty percent of our staff members who work with this student population are bilingual, proficient in both English and Spanish, enabling effective communication and support for LEP students.

LEP individuals engage with the contracted transportation service twice a day on days when they have scheduled classes. The transportation process involves picking up students at their residences and ensuring they reach Central Carolina Community College in time for their scheduled classes. Subsequently, after the conclusion of their classes, students are transported safely back to their places of residence.

Additionally, Central Carolina Community College has an information line that offers bilingual services (English/Spanish) for students that can assist LEP students and coordinate transportation services.

CCCC utilizes 5310 Funding to finance eligible students' transportation rides to and from CCCC and their residences. 5310 funding ensures that LEP students have consistent access to the program, removing transportation-related barriers and allowing them to fully participate in their educational pursuits.

This comprehensive transportation support structure aligns with our commitment to serving LEP individuals effectively and facilitates their regular and meaningful engagement with Central Carolina Community College Foundation programs and resources. We are dedicated to maintaining and improving these services to ensure accessibility and inclusivity for all students.

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

Central Carolina Community College Foundation plays a pivotal role in the lives of individuals we serve, particularly Limited English Proficient (LEP) individuals. Our commitment to providing transportation services extends beyond convenience; it significantly impacts the lives of our students and the broader community. At the heart of our mission is the belief that education should be accessible to all, regardless of language barriers or physical limitations. The transportation services we offer is not just a means of conveyance; it is an enabler of transformation in the lives of our students. Here's how:

Access to Education: Many LEP students face challenges in accessing education due to transportation constraints. By providing transportation services, we break down these barriers, making education accessible to a more diverse and inclusive student population. This access is vital for their personal growth, career advancement, and overall well-being.

Community Connection: For elderly and disabled students, as well as LEP individuals, the opportunity to attend classes at Central Carolina Community College represents more than just academic pursuit. It provides a sense of belonging and connection to the community, fostering social interactions and combating isolation. The program promotes a healthier and happier quality of life.

Independence and Empowerment: By offering transportation services, we empower our students to become more independent. This independence is especially significant for elderly and disabled students who may otherwise rely on family members or caretakers for transportation. It enhances their self-esteem and overall self-sufficiency.

Economic Opportunities: Education is a pathway to economic opportunities, and our transportation services enable LEP students to access the training and education they need to secure better employment prospects. By doing so, we contribute to the economic well-being of our students and the communities they call home.

Diversity and Inclusion: Our commitment to ensuring that 80 percent of our staff working with LEP individuals are bilingual reflects our dedication to diversity and inclusion. This not only facilitates effective communication but also fosters a welcoming environment where all students feel valued and understood.

The transportation program provided by Central Carolina Community College Foundation is not merely a logistical service; it is a lifeline to countless individuals, including LEP students, elderly individuals, and

those with disabilities. The positive impact it has on their lives is immeasurable, as it paves the way for education, community engagement, independence, economic growth, and a more inclusive society.

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

The resources available to Central Carolina Community College students and the overall cost to provide LEP assistance. Central Carolina Community College has identified resources for potential recipients and associated costs for services. The organization maintains a file with specific contact information for service providers, allowing timely updates. The type and scope of services provided often determines costs. As a result, some resources list “indeterminable” as an associated cost until a specific project is identified.

Resource	Associated Cost	Application
Translation	a) \$0.18/word in the target language for languages that use the Roman alphabet (Spanish, French, Portuguese, Italian, etc.) b) \$0.25/word in the source language for other languages (Arabic, Karen, Burmese, Kinyarwanda, Korean, Russian, Vietnamese, Mandarin, Japanese, Hindi, etc.) A minimum charge of \$50 will be applied to translation requests. If a document needs to be translated into several languages, there's a minimum charge of \$25/language. There is a \$40 rush fee for translation work with turnaround times of less than five business days. If the document is up to two pages long, less than four business days' notice.	Translation of written material.
Interpretation Services	Simultaneous interpretation: \$75/hour. If the event is expected to last more than 1.25 hours, two interpreters are needed to maintain the quality of interpretation. The rate is \$75/hr./interpreter. Consecutive interpretation: \$60/hr. We provide interpreting services in Spanish, French, Portuguese, Italian, Arabic, Karen, Burmese, Kinyarwanda, Korean, Russian, Vietnamese, Mandarin, Japanese, Hindi and Swahili. \$65/hour for ASL. 1hr. minimum charge for all languages. Round Trip mileage at the current mileage reimbursement state rate will be charged for in-person interpreting assignments outside of the Chapel Hill-Carrboro area. Phone call interpretation: \$25 minimum charge for calls up to 15 min. long. 1hr. minimum charge applies for calls expected to last longer than that at the corresponding consecutive	Provides onsite/online/phone interpretation services for LEP students.

	interpreting rate (\$60/hr.).	
Public Hearing Notice (English/Spanish)	-Publication in Sanford Herald New Paper - \$588 -Publication on Central Carolina Community College's Website and Social Media Pages - Indeterminable	Notice publication in the local newspaper of Public Hearing notice when applying for new 5310 funding.
Information Line	\$35/ hour X 40 hrs./week= \$ 1,440/week	Provides information services in both (English/Spanish)
Public Hearing	Indeterminable	Provides an opportunity for the public to participate in a public hearing when applying for 5310 funding.

Based on the four-factor analysis, the CCC developed its LEP Plan for students whose primary language is Spanish, as outlined in the following section.

Language Assistance Plan

As a result of the above four-factor analysis, a Language Assistance Plan (Plan) was required for students whose primary language is Spanish. This Plan represents our commitment to ensuring nondiscrimination and meaningful access by Limited English Proficient (LEP) persons. 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 in English and Spanish.
- Vital documents—such as brochures with service and times available—are translated into Spanish across the entire service area and available in all of our campuses.
- Making a concerted effort to inform LEP persons of available language assistance via staff, broadcast media, relationship-building with organizations, and our website.
- Providing translation and interpretive services when appropriate (upon request or predetermined).
- Determining how best to take public involvement to LEP groups directly, including through small group meetings.
- Language line translation services at our call center.
- 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.

Specific Measures by Language Group – **NOTE: THIS SECTION DOES NOT HAVE TO BE COMPLETED IF THE SAFE HARBOR THRESHOLD IS NOT MET FOR ANY LANGUAGE**

Central Carolina Community College Foundation is committed to providing comprehensive language assistance services to LEP students whose primary language is Spanish. This Language Assistance Plan outlines the resources and procedures in place to ensure effective communication and equitable access to educational programs and services.

Resources Available:

1. Translation Services: Central Carolina Community College offers translation services to assist in translating written materials from English to Spanish and vice versa. This service is available for important documents, such as class schedules, registration forms, and academic materials.
2. Interpretation Services: Central Carolina Community College provides both simultaneous and consecutive interpretation services for LEP students to facilitate effective communication during various educational activities.
3. Phone Call Interpretation: LEP students can access phone call interpretation services for assistance with phone conversations and inquiries related to college services.
4. Information Line (Bilingual- English and Spanish): CCCC maintains an information line that is staffed by bilingual representatives who can provide information and answer questions in both English and Spanish.
5. Onsite/Online/Phone Interpretation Services: Central Carolina Community College offers interpretation services for LEP students in various formats, including onsite, online, and phone interpretations, depending on the students' needs and preferences.

Procedures for Accessing Language Assistance Services

1. Identification of LEP Students: Central Carolina Community College will identify LEP students through the enrollment and registration process. Students will be asked about their preferred language for communication.
2. Request for Language Assistance: LEP students may request language assistance services anytime by contacting the Central Carolina Community College's information line at 910-814-8900.
3. Assignment of Interpreters: When language assistance is requested, Central Carolina Community College will assign qualified interpreters based on the specific needs of the student and the nature of the interaction (simultaneous or consecutive).
4. Translation of Written Materials: When written materials need to be translated, students or staff can request this service in advance, and Central Carolina Community College will ensure timely translation.
5. Phone Call Interpretation: LEP students can request phone call interpretation services for important conversations. Appointments may be necessary for longer discussions.

Training and Qualifications: Interpreters and bilingual staff members providing language assistance services will undergo appropriate training to ensure they are proficient in both languages, understand confidentiality requirements, and are culturally sensitive.

Review and Monitoring: Central Carolina Community College Foundation will periodically review and evaluate the effectiveness of this Language Assistance Plan and adjust as needed to ensure quality language services are provided.

Contact Information: For inquiries regarding language assistance services or to request language assistance, please contact the information line at 910-814-8900.

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 and CCCC's information line at (910)814-8900 will be provided a list of referral resources that can assist LEP persons with written translation and oral interpretation, including the Title VI Officer and any outside consultant contracted to provide language services. 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 a speak 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.

8.3 DEMOGRAPHIC REQUEST

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

Central Carolina Community College Foundation 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:

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

Completed forms will remain on file as part of the public record. For more information regarding Title VI or this request, please contact the Central Carolina Community College Foundation Title VI representatives:

Kevin Pearson, Dean of College Access Services
 Phone- 919-718-7386
[Email- kpearson@cccc.edu](mailto:kpearson@cccc.edu)
 and
 Jessica Gonzalez, Director of Human Resources
 Phone- 919-718-7089
[Email- jgonz257@cccc.edu](mailto:jgonz257@cccc.edu)
 Central Carolina Community College Foundation
 1105 Kelly Drive
 Sanford, NC 27330

Please sign below acknowledging that you have completed this form.

Thank you for your participation!

Name (print): _____

Signature: _____

Implementation

- Forms will be completed before 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 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.

8.4 KEY COMMUNITY OUTREACH

Contact Name	Community Name	Interest or Affiliation	Also, a Transportation Advisory Board Member? (Y/N)
Rosa Portillo	Lee	El Refugio	No
John Crumpton	Lee	County of Lee Transportation Services (COLTS)	No
Anne Testerman	Chatham	Chatham Transportation Network	No
<u>Claudia Farnandez</u>	Lee/Chatham/Harnett	CCCC Bell Academy	No
<u>Julian Philpott</u>	Lee/Chatham/Harnett	CCCC Board of Trustees	No
Tana Boerger	Lee/Chatham/Harnett	CCCC Foundation Board	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.

9.0 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

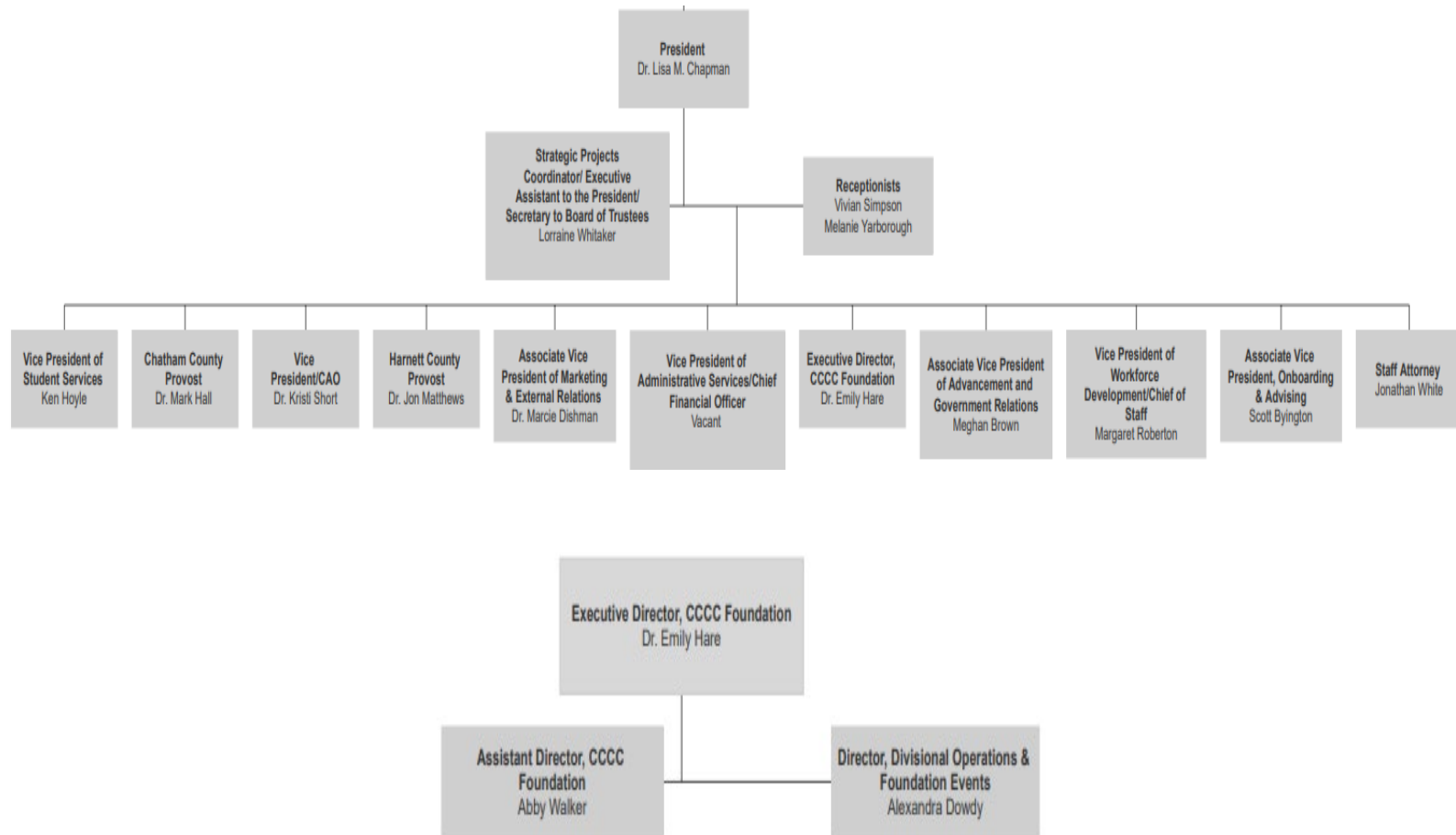
Applicable Nondiscrimination Authorities

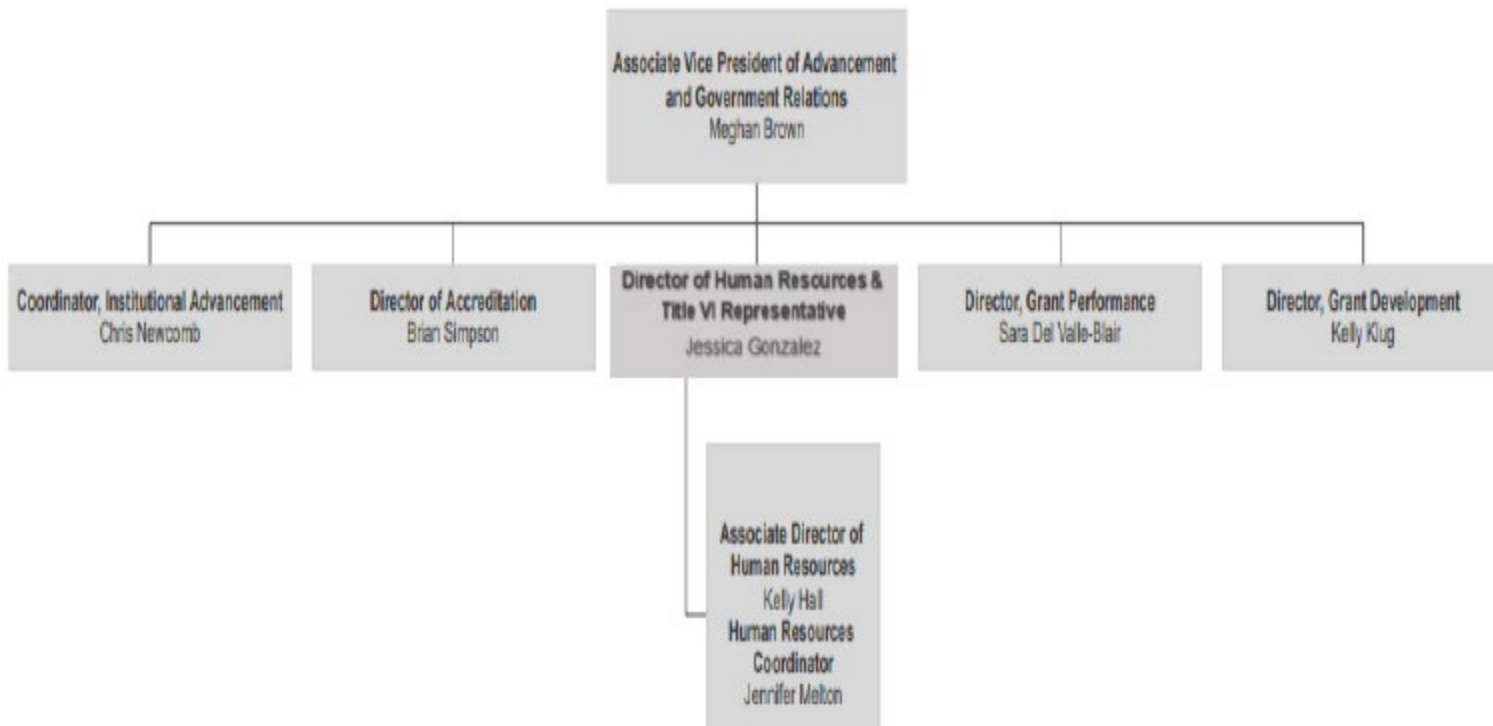
During the implementation of this Title VI Program, the organization, for itself, its assignees and successors in interest, is reminded that it has agreed to comply with the following non-discrimination statutes and authorities, including but not limited to:

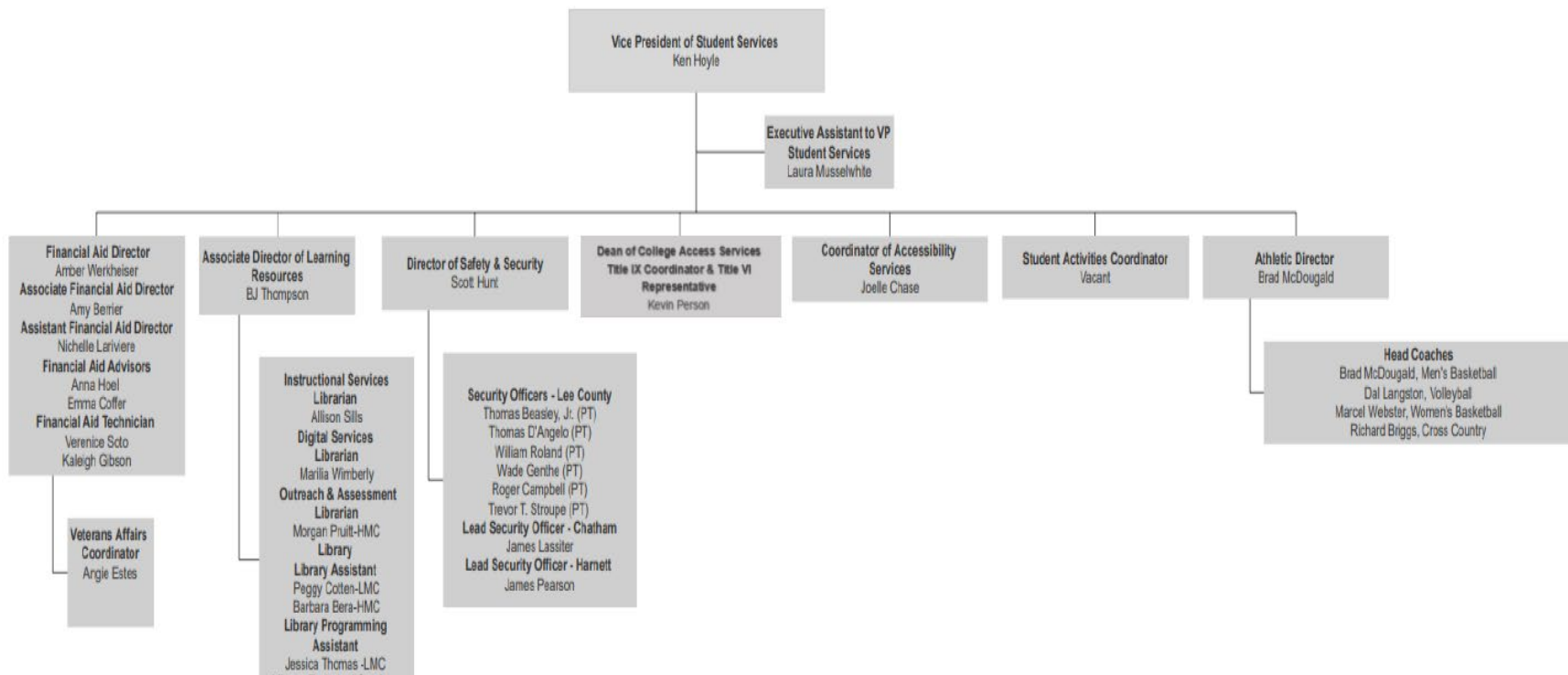
- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair 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 § 471, Section 47123), 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

Foundation Board Members for 2022-2023

Agency Name: Central Carolina Community College Foundation, Inc.

Position	Name	Affiliation/Employer & Job Title	City & State of Residence	Years of Service	Term Ends
Board Chair	Lynda Turbeville	Lynda F. Turbeville Real Estate	Sanford, NC	9	6/25
Vice Chair-Activities	Trey Williams	First Bank Insurance Services	Sanford, NC	5	6/24
Vice Chair-Investment	Linda Harris	Retired	Pittsboro, NC	8	6/25
Vice Chair-Resource Development	Tana Boerger	Retired	Sanford, NC	2.5	6/25
Vice Chair-Board Development	Chas Post	Post, Patton & Foushee	Sanford, NC	9	6/23
Vice Chair-Internal Relations/ Trustee Representative	Julian Philpott	Retired	Sanford, NC	13	6/24
Secretary/Member at Large -Harnett	Parrish Daughtry	Hayes, Williams, Turner & Daughtry	Dunn, NC	10	6/23
Treasurer	Genease Fields	Retired	Sanford, NC	28	6/25
Immediate Past Chair/Member at Large –Chatham	Chris Ehrenfeld	Bold Companies	Chapel Hill, NC	9	6/23
Board Member	Mikeal Basinger	First Bank	Sanford, NC	13	6/24
Board Member	Ken Britton	Herman Miller	Sanford, NC	2	6/25
Board Member	Margaret de St.	Wren Industries	Siler City, NC	9	6/25
Board Member	Aubin David Harris	Welford Harris, Inc.	Siler City, NC	2	6/23
Board Member	Jon Hockaday	WWGP/WFJA	Sanford, NC	2	6/25

Board Member	Barber Holmes	Holmes Oil Company	Chapel Hill,	11	6/25
Board Member	Tom Joyner	Retired	NC Sanford,	13	6/25
Board Member	Josh Lee	Moody, Williams, Roper & Lee	NC	8	6/25
Board Member	George Lucier	Retired	Siler City, NC Pittsboro, NC	13	6/25
Board Member	Lee Tart Malone	Tart Law Group	Dunn, NC	7	6/23
Board Member	Linda Moore	Retired	Sanford, NC	1	6/24
Board Member	Tim Morris	Timothy C. Morris, PA	Erwin, NC	2	6/23
Board Member	Margaret Murchison	WWGP/WFJA	Sanford, NC	6	6/24
Board Member	Lupita Norato	Verizon Wireless	Sanford, NC	1	6/24
Board Member	Bobby Powell	Retired	Sanford, NC	16	6/25
Board Member	John Ramsperger	Sanford Real Estate	Sanford, NC	2	6/25
Board Member	Deirdre Stephenson	Stephenson & Stephenson	Sanford, NC	3	6/25
Board Member	Sharon Stevens	Dunn Area Tourism Authority	Dunn, NC	2	6/23
Board Member	Lucia Turlington	Turlington Real Estate Group	Dunn, NC	6	6/23
Board Member	Greg Vassie	501 Pharmacy	Chapel Hill, NC	2	6/25

Board Member	Becky Whitaker	NC Sentencing & Policy Advisory Commission	Sanford, NC	2	6/23
Board Member	Bill Wilson	Wilson & Reives	Sanford, NC	5	6/24
Board Member	Carson Wilson	NAI Carol antic Realty, Inc.	Sanford, NC	2	6/25
Board Member, CCCC President	Lisa M. Chapman	CCCC	Sanford, NC	3	N/A

Appendix D

NCDOT's Compliance Review Checklist for Transit

I. Program Administration (General Requirements) <i>Requirement: FTA C 4702.1B – Title VI Requirements and Guidelines for FTA Recipients, Chapter III – General Requirements and Guidelines.</i> 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	☐
2. Title VI Policy Statement (<i>signed</i>)	☐
3. Title VI Notice to the Public, including a list of locations where the notice is posted	☐
4. Type the name and title of your Title VI Coordinator and attach a list of their Title VI duties Name/Title:	☐
5. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)	☐
6. Title VI Complaint Form	☐
7. List of transit-related Title VI investigations, complaints, and lawsuits (i.e., discrimination complaints log)	☐
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	☐
9. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance, which requires conducting four-factor analyses	☐
10. A table depicting the membership of 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	☐
11. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program	☐
12. A description of the procedures the agency uses to ensure nondiscriminatory administration of programs and services	☐
13. If you pass through FTA funds to other organizations , include a description of how you monitor your subrecipients for compliance with Title VI, and a schedule for your subrecipients' Title VI Program submissions. ➤ No Subrecipients ☐	☐
14. A Title VI equity analysis if you have constructed or conducted planning for a facility , such as a vehicle storage facility, maintenance facility, operation center, etc. ➤ No Facilities Planned or Constructed ☐	☐
15. Copies of environmental justice assessments conducted for any construction projects during the past three years and, if needed based on the results, a description of the program or other measures used or planned to mitigate any identified adverse impact on the minority or low-income communities	☐

➤ No Construction Projects ☐		
16. If the recipient has undergone a Title VI Compliance Review in the last 3 years, please indicate the year of the last review and who conducted it. Year/Agency:		☐
II. Transit Providers Requirement: FTA C 4702.1B, Chapter IV – Requirements and Guidelines for Fixed Route Transit Providers. Note: All NCDOT subrecipients that provide <u>fixed route</u> public transportation services (e.g., local, express or commuter bus; bus rapid transit; commuter rail; passenger ferry) must complete this section. ➤ Not Applicable ☐ (Check this box if you do not provide <u>fixed route</u> services, and skip questions 17 and 18. This section does not apply to you if you only provide demand response services.)		
Requested Items (Please attach electronic documents (.pdf, .doc, etc.) or provide links to online versions)		Completed
17. Service standards (quantitative measures) developed for <i>each specific fixed route mode</i> that the recipient provides (standards may vary by mode) must be submitted for each of the following indicators:		
Vehicle load for each mode (Can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees.)		☐
Vehicle headway for each mode (Measured in minutes (e.g., every 15 minutes), headway refers to the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Service frequency is measured in vehicles per hour (e.g., 4 buses per hour).)		☐
On time performance for each mode (Expressed as a percentage, this is a measure of runs completed as scheduled. The recipient must define what is considered to be "on time." Performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along a route.)		☐
Service availability for each mode (Refers to a general measure of the distribution of routes within a transit provider's service area, such as setting the maximum distance between bus stops or train stations, or requiring that a percentage of all residents in the service area be within a one-quarter mile walk of bus service.)		☐
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 <u>only</u> 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.)		☐

Signature Certificate

Reference number: HJV47-CRYY8-FXYLQ-JZWAZ

Signer

Emily Hare

Email: ehare379@cccc.edu

Sent:

Viewed:

Signed:

Timestamp

10 Jan 2024 22:00:13 UTC

11 Jan 2024 13:30:34 UTC

11 Jan 2024 13:31:18 UTC

Signature

Emily Hare

Recipient Verification:

✓ Email verified

11 Jan 2024 13:30:34 UTC

IP address: 152.27.23.66

Location: Sanford, United States

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11 Jan 2024 13:31:18 UTC

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