

Title VI Program Plan
The Workshop of Davidson, Inc.



Date of Adoption: 10/25/2023

TITLE VI PLAN REVIEW AND ADOPTION

On behalf of the Board of Directors for The Workshop of Davidson, Inc., I hereby acknowledge receipt of the Title VI Nondiscrimination Plan. We, the 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 The Workshop of Davidson, Inc. 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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Signature of Authorizing Official

02/07/2024
2/7/24

DATE

Table of Contents

Title VI Nondiscrimination Agreement	4
1.0 Introduction	5
2.0 Description of Programs and Services	5
2.1 Services- Transportation Services, Program Services	5-6
2.2 Funding Sources	6
2.3 Decision-Making Process	6-7
2.4 Title VI Coordinator	7-8
2.5 Organizational Chart	8
3.0 Title VI Nondiscrimination Policy Statement	9
4.0 Notice of Nondiscrimination	9-10
5.0 Procedures to Ensure Nondiscriminatory Administration of Programs and Services	10-11
6.0 Contract Administration	11- 13
7.0 Discrimination Complaint Procedures	13-14
Discrimination Complaint Form	15-16
Discrimination Complaints Log	17
Investigative Guidance	18
SAMPLE Investigative Report Template	19
8.0 Title VI Equity Analyses (and Environmental Justice Assessments)	20
9.0 Public Involvement	20
9.1 Introduction	20
9.2 Public Notification	20
9.3 Dissemination of Information	20-21
9.4 Meetings and Outreach	21
9.5 Limited English Proficiency	21-24
9.6 Demographic Requests	24-25
9.7 Demographic Request Table	26
9.8 Key Community Outreach	26
10.0 Records-Keeping and Reports	26-27
Appendices	
Appendix A – Applicable Nondiscrimination Authorities	28
Appendix B – Organizational Chart – The Workshop of Davidson	29
Appendix B- 2 Organizational Chart- Davidson County/ Davidson County Transportation System	30
Appendix C- NOTICE OF NONDISCRIMINATION (Spanish)	31
Appendix D– NCDOT’s Transit Review Checklist	32-33

TITLE VI NONDISCRIMINATION AGREEMENT
BETWEEN
THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION, Winston Salem DOT / MPO
AND
THE WORKSHOP OF DAVIDSON, INC.

In accordance with DOT Order 1050.2A, The Workshop of Davidson, Inc. assures the North Carolina Department of Transportation (NCDOT) and WSMPO 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 The Workshop of Davidson, Inc.

Further, The Workshop of Davidson, Inc. hereby agrees to:

1. Designate a Title VI Coordinator that has a responsible position within the organization and easy access to the Executive Director of the organization.
2. Issue a policy statement, signed by the Executive 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 Executive 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 sub-recipients.
7. Take affirmative action, if reviewed or investigated by NCDOT /WSMPO, to correct any deficiencies found within a reasonable time period, not to exceed 90 calendar days, unless reasonable provisions are granted by NCDOT /WSMPO.
8. Document all Title VI nondiscrimination-related activities as evidence of compliance. Submit information and reports to NCDOT / WSMPO on a schedule outlined by NCDOT/ WSMPO.

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.

<i>Kara Cody</i>	11/14/2023
Authorized Signature	Date
Kara Cody Executive Director	

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, sub-recipients, and contractors, including those that are not federally-funded (see Appendix A – Applicable Nondiscrimination Authorities).

The Workshop of Davidson, Inc. is a recipient of Federal Transit Administration (FTA) funds from the North Carolina Department of Transportation (NCDOT). The Workshop of Davidson, Inc. 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 The Workshop of Davidson, Inc., 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

The Workshop of Davidson Inc. is a non-profit organization dedicated to the training of vocational, residential and life skills for intellectually and developmentally disabled adults. All door to door transportation routes are coordinated through Davidson County Transportation Systems under an Inter-Local Agreement with Davidson County.

2.1 Services

Transportation Services:

Day Program:

- Door to Door Transport provided by a Third Party Contracted Company- services are under Inter-Local Agreement with Davidson County Transportation System- through Davidson County.
- Monday – Friday Pick up and Drop off times are scheduled in advance for arrival around 8AM and departure at 3:45PM from 275 Monroe Road Location.
- After arrival at Day Program - Daily transport to activities and social functions is provided by The Workshop of Davidson staff while participating in the program.
- No fees for transportation

Group Homes:

- Group Home Transportation is conducted 7 days a week for residents to attend day programs, jobs, volunteer opportunities, medical appointments, social functions, etc. This transportation is conducted by The Workshop of Davidson Group Home Staff and is only provided to residents of The Workshop of Davidson Group Homes.
- Fees are not directly collected for transportation- Room & Board is paid by each resident.

Program Services:

Day Programs: Innovations, Long Term Community Supports, B3 Services, Job Coaching Services, ADVP.

Location: 275 Monroe Road Lexington, NC 27292

Days/Hours of Operation:

Monday – Friday Staff 7:45-4:15

Persons Served: 8:15-3:45

Tours available by appointment only

No fees for services

Group Homes: The Workshop of Davidson, Group Home I (Female Only)

The Workshop of Davidson, Group Home II (Male Only)

Locations: Not publicly posted.

Group Homes are 24 hour programs but the residents must be occupied by a job, day program, or volunteer opportunity during the hours of 8:00-4:00.

Tours available by appointment only.

Fees: Room and Board amounts are set by the Department of Social Services- see Group Home Coordinator for more information.

2.2- Funding Sources:

Door to Door Third Party Contracted Amounts- Under Inter- Local Agreement with Davidson County Transportation System- through Davidson County

- 5310 Capital Purchase of Service Grants from NCDOT
- 5310 Capital Purchase of Service Grants from WSMPO
- United Way Funding

Day Program Transport for Activities

- United Way Funding
- LME/MCO Funding for day services provided

Group Home Transport

- LME/MCO funding for residential services provided
- Room and Board from residents assists with costs of transportation
- United Way Funding

2.3- Decision Making Processes:

The Workshop of Davidson is a 501(c) 3 governed by a fifteen member Board of Directors.

- The Executive Director has been designated to develop and implement policies and procedures for The Workshop of Davidson.
- New policies are presented for review by The Board of Directors
- The Workshop of Davidson Board of Directors meets four times a year as scheduled by the Executive Director
- The Workshop of Davidson Conducts a public annual meeting once a year

Transportation Advisory Board / Davidson County Transportation System / Davidson County

- The Workshop of Davidson maintains a member (generally the Executive Director) on the Davidson County Transportation Advisory Board
- Annually The Workshop of Davidson enters into an Inter Local Agreement with Davidson County that allows The Workshop of Davidson to apply for funding under the umbrella of Davidson County Transportation System.
- All decisions that are approved through the Davidson County Transportation Advisory Board that require approval by Davidson County are presented to the County Commissioners at one of their regularly scheduled meetings.
- Davidson County Commissioners meet three times a month and meeting times are posted publicly on the county website.

2.4 Title VI Coordinator:

The Title VI Coordinator for The Workshop of Davidson will be the agencies Executive Director; this position is empowered with the authority and responsibilities to implement the Title VI Nondiscrimination Program.

Kara Cody, Executive Director

Mailing Address: PO Box 906 Lexington, NC 27293

Physical Address: 275 Monroe Road Lexington, NC 27292

Phone: 336-248-2816

Fax: 336-248-4995

Email: wsddir@workshopofdavidson.org

Key responsibilities for Title VI Coordinator:

- Maintaining knowledge of Title VI and related requirements.
- Administering the Title VI Nondiscrimination Program and coordinating implementation of this Plan.
- As Required Training internal staff and officials on their Title VI nondiscrimination obligations.
- As Required 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.
- Ensuring the collection of demographic data related to race, national origin, sex, age, and disability is completed; to ensure minority, low-income, and other underserved groups are included and not discriminated against.
- Ensuring that board of directors and committees reflect the service area and minorities are represented.
- Ensuring procedures for prompt processing (receiving, logging, investigating and/or forwarding) of discrimination complaints is completed.
- 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 Organizational chart

- See appendix B for The Workshop of Davidson, Inc. Organizational Chart
- The Workshop of Davidson has an Inter Local Agreement with Davidson County /Davidson County Transportation System See appendix B-2 for Davidson County Transportation System Organizational Chart

3.0 TITLE VI NONDISCRIMINATION POLICY STATEMENT

It is the policy of The Workshop of Davidson, Inc., 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.

Kara Cody

Kara Cody, Executive Director

11/14/2023

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, sub-recipients, 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

- The Workshop of Davidson Inc. 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 Workshop of Davidson, Inc.
- For more information on The Workshop of Davidson’s civil rights program, and the procedures to file a complaint, contact 336-248-2816, fax:36-248-4995, email: wsddir@workshopofdavidson.org; or visit our administrative office at 275 Monroe Road Lexington, NC 27292.
- If information is needed in another language, contact 336-248-2816 and request Language Line Assisted Services.
- 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

- As materials such as client handbooks and websites are updated The Notice of Non-Discrimination will be added to these materials/website
- The notice will be posted in our office and client service area.
- Ads in newspapers and other publications shall include the following: “The Workshop of Davidson, Inc. operates without regard to **race, color, national origin, sex, creed (religion), age or disability**. For more information on The Workshop of Davidson’s Title VI program or how to file a discrimination complaint, please contact 336-248-2816; wsddir@workshopofdavidson.org.”
- The statement will be posted or provided in languages other than English, when appropriate.
- See **Appendix C** for a Spanish version of this notice.

5.0 PROCEDURES TO ENSURE NONDISCRIMINATORY ADMINISTRATION OF PROGRAMS AND SERVICES

We are committed to nondiscriminatory administration of our programs and services, organization wide. The Workshop of Davidson, Inc. 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.

**The Workshop of Davidson, Inc.
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 The Workshop of Davidson, Inc. 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 Kara Cody, Title VI Coordinator at 336-248-2816 or kcody@workshopofdavidson.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 or Review of Title VI Program

I hereby acknowledge receipt or review of The Workshop of Davidson, Inc. 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 The Workshop of Davidson’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 or 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

The Workshop of Davidson, Inc. 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. The Workshop of Davidson, Inc. 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 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:

KDC

Contractor's Initials

11/14/2023 **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.

7.0 DISCRIMINATION COMPLAINT PROCEDURES

These discrimination complaint procedures outline the process used by The Workshop of Davidson, Inc. 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 The Workshop of Davidson, Inc. 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:

- **The Workshop of Davidson, Inc.** PO Box 906 Lexington, NC 27293 336-248-2816
 - **North Carolina Department of Transportation**, Office of Civil Rights, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 984-236-1200
 - **Winston-Salem Department of Transportation**: Title VI Complaints, Suite 307, Bryce A. Stuart Municipal Building, 100 E. First Street, Winston-Salem, NC 27107; 336-747-6868
 - **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.

The Workshop of Davidson, Inc.

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 The Workshop of Davidson, Inc., 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"/> CREED (RELIGION)		<input type="checkbox"/> DISABILITY		<input type="checkbox"/> AGE	
				<input type="checkbox"/> SEX	
				<input type="checkbox"/> LIMITED ENGLISH PROFICIENCY	
<i>*NOTE: Title VI bases are race, color, national origin. All other bases are found in the "Nondiscrimination Assurance" of the FTA Certifications & Assurances.</i>					
Identify the Race of the Complainant					
<input type="checkbox"/> Black		<input type="checkbox"/> White		<input type="checkbox"/> Hispanic	
<input type="checkbox"/> American Indian		<input type="checkbox"/> Alaskan Native		<input type="checkbox"/> Asian American	
				<input type="checkbox"/> Pacific Islander	
				<input type="checkbox"/> Other _____	
Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.					
Names of individuals responsible for the discriminatory action(s):					
How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional page(s), if necessary).					
The law prohibits intimidation or retaliation against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.					
Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: (Attached additional page(s), if necessary).					
<u>Name</u>		<u>Address</u>		<u>Telephone</u>	
1. _____		_____		_____	
2. _____		_____		_____	
3. _____		_____		_____	
4. _____		_____		_____	

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 The Workshop of Davidson, Inc. 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:

Kara Cody Title VI Coordinator
 The Workshop of Davidson, Inc.
 PO BOX 906
 Lexington, NC 27293
 wsddir@workshopofdavidson.org
 336-248-2816

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.

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.]

8.0 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.

9.0 PUBLIC INVOLVEMENT

9.1 INTRODUCTION

Effective public involvement is a key element in addressing Title VI in decision-making. This **Public Participation Plan** describes how The Workshop of Davidson, Inc. 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 intellectually and developmentally disabled adults. 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:

- Use of social media and other resources as a way to gain public involvement.
- Memos /Flyer's etc. as provided sent to program participants, guardians, or legally responsible persons
- Providing opportunities for public participation through means other than written communication, such as personal interviews or assistance with surveys as needed.
- As required newspaper notices in English and Spanish.

9.2 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. Additional measures may include verbally announcing our obligations and the public's rights at meetings.

9.3 DISSEMINATION OF INFORMATION

The Workshop of Davidson does not provide transportation to members of the general public, we contract services through a Third party provider and hold an Inter Local Agreement with Davidson County Transportation System – through Davidson County.

Information on Title VI and other programs will be crafted and disseminated to employees, contractors and person served. Public dissemination efforts may vary depending on factors present, but will generally include: posting public statements in our office and program service area.

At a minimum, nondiscrimination information will be disseminated in conspicuous areas at our office.

9.4 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 such as disabled adults 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.
- 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.
- 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 or annual meetings.

- Public meetings will be conducted at times, locations, and facilities that are convenient and accessible.
- Assistance to persons with disabilities or limited English proficiency will be provided, as required.

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 provided to persons served, guardians, or legally responsible persons
- Surveys will be translated into languages other than English, when appropriate.

9.5 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.

At this time The Workshop of Davidson serves no Spanish speaking persons. Several non-verbal persons are served and are communicated with through ASL, in writing, or with the assistance of interpreter as needed.

LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error
Total (population 5 years and over):	19656	+/-	100%	(X)
Speak only English	14,346	+/- 644	73%	+/- %
Spanish or Spanish Creole:	2655	+/- 547	13.5%	+/- %
Speak English "very well"	1335	+/-342	6.8%	+/- %
Speak English less than "very well"	1320	+/-280	6.7%	+/- %

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

At this time The Workshop of Davidson serves no Spanish speaking persons. Several non-verbal persons are served and are communicated with through ASL, in writing, or with the assistance of interpreter as needed.

As we only contract transportation services we do not know the contact levels the riders have with drivers, call centers, etc.

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

Transportation is the backbone of all that we do. Without the ability to arrive each day safely and without cost to the individual, most riders would not be able to participate in our programs. The adults with intellectual and developmental disabilities that we serve depend on the availability of transportation for them to be able to attend our services. Due to the inability to own or operate a motor vehicle participants must rely on others to navigate transportation for them as well the financial limitations or lack of family support that is prevalent in our service catchment many that we serve would be sitting at home if transportation was not being provided. Without access opportunities there are no services for the 20-30 people who receive support through this funding and up to 16,000 trips would go unutilized.

The availability of transportation offers the ability for persons to attend a variety of programs operated by The Workshop of Davidson to include but not limited to: Day Programs that offer vocational and life skills training that give persons served the opportunity to learn and retain skills, earn a paycheck, and to expand opportunities for growth and inclusion. Community inclusion activities of all sorts on a regular basis; such as going to art exhibits, musical events, or museums, we can learn history one day and current events the next. We offer participants the chance to work on their health by keeping everyone moving, we go swimming, to parks, the driving range, the recreation department, and lots of other activities. Each person in our programs has individualized needs that we work as a team to address; everyone has a goal plan that is designed with the specific tasks or goals that they are trying to reach in order to strengthen their personal skills. These goals can range from maintaining or improving behavioral struggles, staying focused on production tasks, maintaining personal care skills like being able to toilet themselves or to eat without assistance to more complex tasks like being able to respond to an interview or complete a resume.

Our community integrated B3 supported employment program affords individuals the opportunity to receive support while in the community to work towards being gainfully employed. We have had Vocational Rehabilitation job coaching programs for decades, but the B3 and Innovations supported employment services offer an even greater level of client /staff interaction. Greater levels of support have led to persons who were unable to try community employment in the past being able to have this opportunity. Overall our services offer persons opportunities to gain self-sufficiency. Living their lives with the satisfaction of knowing that each day they learn skills that get them closer to realizing their individual life goals, funding for transportation and access to services are where that all begins.

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

The Workshop of Davidson maintains a contract with Language Line, which is an interpreter service. We do not have a projected cost for the agency as we have never had to use this service. Translation of materials is completed as needed with assistance from online translation apps or websites. There would be no charges to program participants for these services.

LANGUAGE ASSISTANCE PLAN

As a result of the above four factor analysis, a Language Assistance Plan (LAP) was not required. However, reasonable attempts will be made to accommodate any persons encountered who require written translation or oral interpretation services.

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 into Spanish.
- Vital documents—such as brochures or handbooks would be translated on an as needed basis.
- Providing translation and interpretive services when appropriate (upon request or predetermined) at meetings.
- Language line translation services available via phone or internet
- Where possible, utilizing or hiring staff that speak a language other than English and can provide competent language assistance.
- Using language identification poster to determine appropriate services.

Specific Measures by Language Group –

Spanish: Materials will be translated on an as needed basis and Language line assistance is available on an as needed basis.

Written Translation and Oral Interpretation

Exposure to persons speaking other languages is so low at The Workshop of Davidson, that documents will only be translated in writing on an as needed basis.

When appropriate, translation of any document will be communicated orally in the appropriate language.

Staff Support for Language Assistance

- The Workshop of Davidson contracts transportation services and therefore cannot control what translation services are provided by the Third Party transportation company.
- The Workshop of Davidson uses online interpretation for document translation and uses Language line or translators provided by DSS or Vocational Rehabilitation when translators are required.
- Located in the main office is a language translation poster that the person served can point to the language they speak and then services will be initiated through Language Line
- **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 trainings (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.

9.6 DEMOGRAPHIC REQUEST

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

The Workshop of Davidson, Inc. 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> <p><input type="checkbox"/> White</p> <p><input type="checkbox"/> Black/African American</p> <p><input type="checkbox"/> Asian</p> <p><input type="checkbox"/> American Indian/Alaskan Native</p> <p><input type="checkbox"/> Native Hawaiian/Pacific Islander</p> <p><input type="checkbox"/> Hispanic/Latino</p> <p><input type="checkbox"/> Other (please specify): _____</p>	<p>National Origin: (if born outside the U.S.)</p> <p><input type="checkbox"/> Mexican</p> <p><input type="checkbox"/> Central American: _____</p> <p><input type="checkbox"/> South American: _____</p> <p><input type="checkbox"/> Puerto Rican</p> <p><input type="checkbox"/> Chinese</p> <p><input type="checkbox"/> Vietnamese</p> <p><input type="checkbox"/> Korean</p> <p><input type="checkbox"/> Other (please specify): _____</p>
<p>Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female</p>	<p>Age:</p> <p><input type="checkbox"/> Less than 18 <input type="checkbox"/> 45-64</p> <p><input type="checkbox"/> 18-29 <input type="checkbox"/> 65 and older</p> <p><input type="checkbox"/> 30-44</p>
<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 Workshop of Davidson, Inc. at 336-248-2816 or by email at wsddir@workshopofdavidson.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.

9.7 DEMOGRAPHIC REQUEST TABLE:

Body	Male %	Female %	Caucasian %	African American %	Asian American %	Native American %	Other %	Hispanic %
Service Area Population	55	45	91	0	3	0	0	6
The Workshop of Davidson Board	46.67	53.33	80	0	6.67	0	0	13.33
DC Transportation Advisory Board	61	39	100	0	0	0	0	0

9.8 KEY COMMUNITY OUTREACH

Contact Name	Community Name	Interest or Affiliation	Also a Committee Member? (Y/N)
Debbie Harris	Davidson County	Clerk to the County Commissioners	Y (Workshop Board)
Richard Jones	Davidson County	Director of DC Transportation	Y (TAB Member)

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.

10.0 RECORDS-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.)

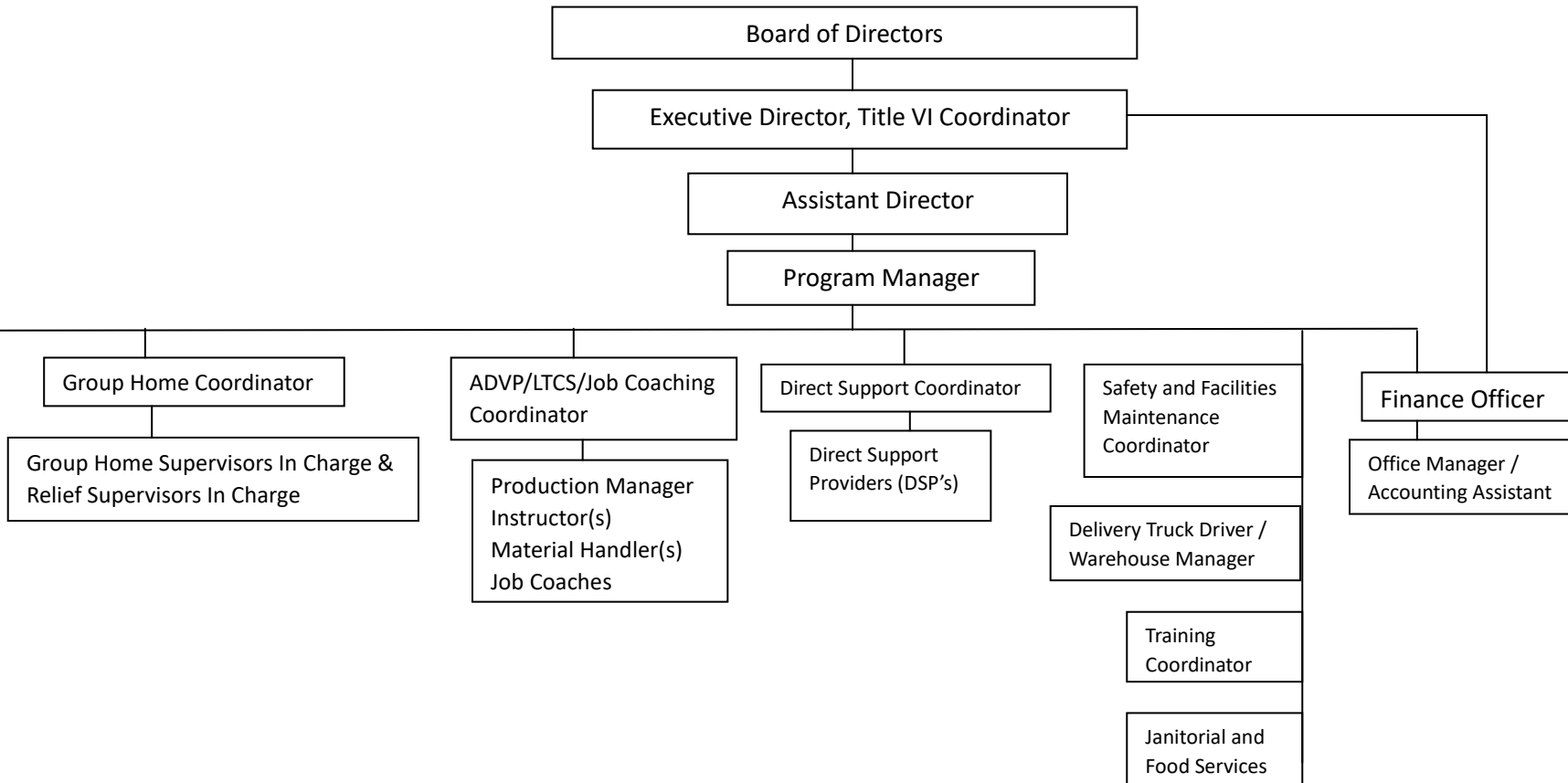
Appendix A

Applicable Nondiscrimination Authorities

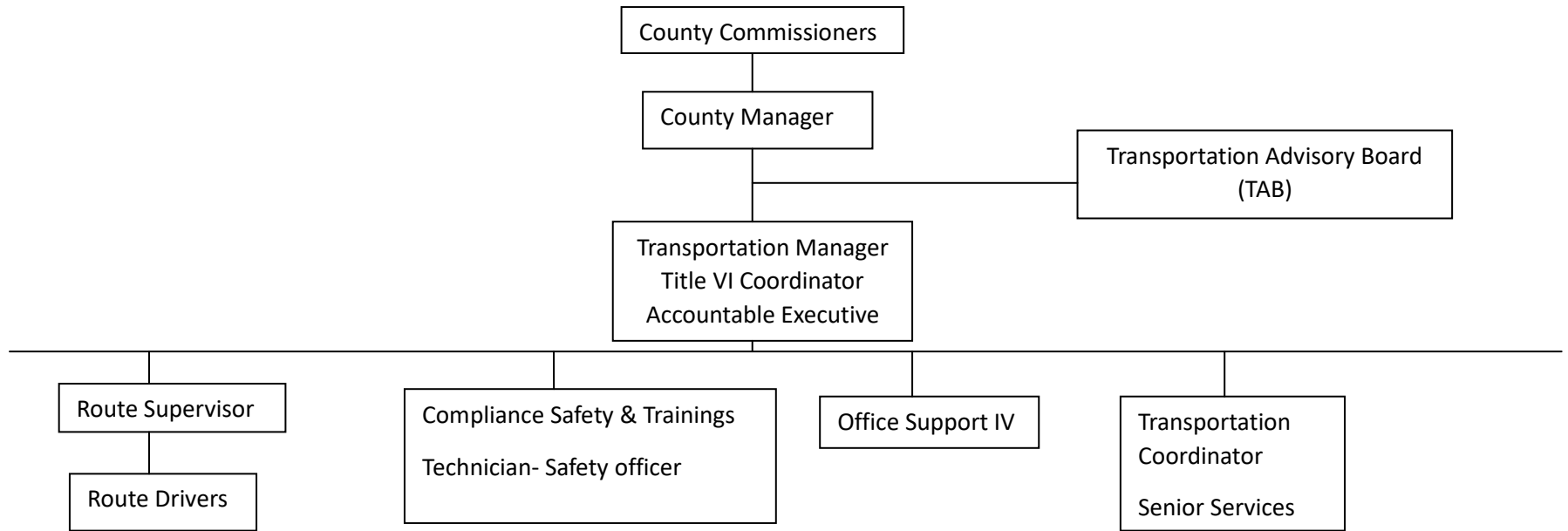
During the implementation of this Title VI Program, the organization, for itself, its assignees and successors in interest, is reminded that it has agreed to comply with the following non-discrimination statutes and authorities, including but not limited to:

- 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
Chart of Organization
The Workshop of Davidson, Inc.**



**Appendix B-2
Chart of Organization
Davidson County Transportation System**



Appendix C
NOTICE OF NONDISCRIMINATION (Spanish)

NOTIFICACION SOBRE LA DISCRIMINACION

*The Workshop of Davidson, Inc. cumple con las leyes federales de derechos civiles aplicables y no discrimina por motivos de **raza, color, nacionalidad, edad, discapacidad o sexo** de acuerdo con el Título VI de los Derechos Civiles. Cualquiera persona que cree que él o ella ha sido víctima de discriminación puede presentar su queja con The Workshop of Davidson, Inc.*

Para obtener más información sobre el programa de derechos civiles The Workshop of Davidson, Inc. y para obtener más información sobre el procedimiento para presentar una queja, comuníquese al (336) 248-2816, envíe un correo electrónico a wsddir@workshopofdavidson.org o visite nuestra oficina administrativa en 275 Monroe Road, Lexington NC.

Si necesita información en otro idioma comuníquese por correo electrónico wsddir@workshopofdavidson.org

El reclamante puede meter su reclamo directamente a el Departamento de Transportación de Carolina del Norte ante la Office of Civil Rights (Oficina de Derechos Civiles), External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511, Attention Title VI Nondiscrimination Program (Atención al Título VI Programa sin Discriminación), número telefónico 919-508-1808 o 800-522-0453 o TDD/TTY: 800-735-2962.

O el Departamento de Transporte de Winston-Salem: Quejas según el Título VI, Suite 307, Bryce A. Stuart Municipal Building, 100 E. First Street, Winston-Salem, NC 27107; 336-747-6868

El reclamante también puede meter su reclamo directamente a la Administración Federal de Transito ante la Office of Civil Rights (Oficina de Derechos Civiles), Attention: Title VI Program Coordinator (Atención: Titulo VI Coordinador de Programa), East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Appendix D
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 checked="" type="checkbox"/>
2. Title VI Policy Statement (<i>signed</i>)	<input checked="" type="checkbox"/>
3. Title VI Notice to the Public, including a list of locations where the notice is posted	<input checked="" type="checkbox"/>
4. Type the name and title of your Title VI Coordinator and attach a list of their Title VI duties Name/Title: Kara Cody, Executive Director	<input checked="" type="checkbox"/>
5. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)	<input checked="" type="checkbox"/>
6. Title VI Complaint Form	<input checked="" type="checkbox"/>
7. List of transit-related Title VI investigations, complaints, and lawsuits (i.e., discrimination complaints log)	<input checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/>
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 <input checked="" type="checkbox"/>	<input type="checkbox"/>
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 <input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>

<p>➤ No Construction Projects <input checked="" type="checkbox"/></p>	
<p>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:</p>	<input type="checkbox"/>
<p>II. Transit Providers</p> <p><i>Requirement: FTA C 4702.1B, Chapter IV – Requirements and Guidelines for Fixed Route Transit Providers.</i></p> <p>Note:All NCDOT subrecipients that provide fixed route public transportation services (e.g., local, express or commuter bus; bus rapid transit; commuter rail; passenger ferry) must complete this section.</p> <p>➤ Not Applicable <input checked="" type="checkbox"/> (Check this box if you do not provide fixed route services, and skip questions 17 and 18. This section does not apply to you if you only provide demand response services.)</p>	
<p>Requested Items (Please attach electronic documents (.pdf, .doc, etc.) or provide links to online versions)</p>	<p>Completed</p>
<p>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:</p> <ul style="list-style-type: none"> • 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.) 	<input type="checkbox"/>
<ul style="list-style-type: none"> • 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).) 	<input type="checkbox"/>
<ul style="list-style-type: none"> • 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.) 	<input type="checkbox"/>
<ul style="list-style-type: none"> • 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.) 	<input type="checkbox"/>
<p>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:</p> <ul style="list-style-type: none"> • 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.) 	<input type="checkbox"/>
<ul style="list-style-type: none"> • 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.) 	<input type="checkbox"/>

**RESOLUTION APPROVING TITLE VI POLICY STATEMENT FOR
THE WINSTON-SALEM METROPOLITAN PLANNING ORGANIZATION (MPO)**

A motion was made by TAC Member Allen Joines and seconded by TAC Member John Bost for the adoption of the following resolution, and upon being put to a vote was duly adopted.

WHEREAS, the Winston-Salem Metropolitan Planning Organization (MPO) is responsible for all transportation planning in the region; and

WHEREAS, Title VI of the Civil Rights Act of 1964 prohibits discrimination by government agencies that receive federal funds and any agency found in violation may lose its federal funding; and

WHEREAS, the Federal Highway Administration (FHWA) recently adopted a policy requiring urban areas to adopt a formal Title VI Policy Statement; and

WHEREAS, the North Carolina Department of Transportation (NCDOT) Civil Rights Office has assisted urban areas across the state with this endeavor; and

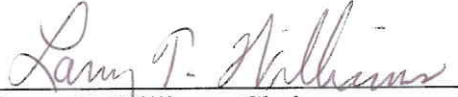
WHEREAS, NCDOT has completed a six month review of the Winston-Salem MPO policies and procedures; and


WHEREAS, NCDOT has requested that Winston-Salem MPO adopt a Title VI Policy Statement; and

WHEREAS, by adopting a Title VI Policy Statement, the Winston-Salem MPO affirms its commitment to complying with Title VI of the Civil Rights Act of 1964.

NOW, THEREFORE, BE IT RESOLVED that the Transportation Advisory Committee of the Winston-Salem Urban Area Metropolitan Planning Organization officially adopts a Title VI Policy Statement for the Winston-Salem Urban Area.

Adopted on this the 16th day of February, 2012.


Larry T. Williams, Chairman
Transportation Advisory Committee


Margaret C. Bessette, Secretary
Transportation Advisory Committee