

JACKSON COUNTY TRANSIT

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May 11, 2015

MEMORANDUM

To: Jackson County Board of Commissioners
From: Chuck Norris, Transit Director
Subject: Jackson County Transit Title VI Policy

The NCDOT Office of Equal Opportunity and Workforce Services (EOWS), External Civil Rights Section has the responsibility to conduct Title VI compliance reviews of transit systems to assure compliance with Title VI program requirements, as set forth in 49 Code of Federal Regulations 21 (CFR); 23 CFR 200; and FTA Circular 4702.1B. The purpose of a compliance review is to discuss a recipient's Title VI requirements, and determine if they are being implemented effectively. In keeping with the Federal guidelines above, NCDOT determined that a compliance review of **Jackson County Transit (JCT)** was necessary.

The objectives of this compliance review were to determine if deficiencies exist in the documentation of Title VI program requirements to determine if services, benefits, and activities are being provided without regard to race, color, national origin, sex, age, or disability, and to determine if the transit system evaluates the benefits and burdens of its decisions on traditionally underserved populations (e.g., low-income, children, minorities, the elderly, LEP, disabled). Thus, this review also sought to determine if the transit system's Title VI Program is current with changes in FTA's guidance on Title VI. Finally, this process will provide the transit system with opportunities to remedy any deficiencies through appropriate corrective action, technical assistance, and training.

The North Carolina Department of Transportation Office of Equal Opportunity and Workforce Services External Civil Rights Section conducted a review/audit of our current Title VI Program Policy on January 29, 2015. At the conclusion of the review there were 12 deficiencies identified by the compliance/assessment officer and a Corrective Action Plan was implemented. We were given until May 12, 2015 to address the deficiencies.

With the assistance of External Civil Rights Section of NCDOT we have corrected all the deficiencies identified during the Title VI Program review/audit. The compliance officer has reviewed and approved the corrective action and has agreed that the compliance review will be officially closed upon approval by the board of commissioners. We respectfully ask that this policy be approved at the May 21, 2015 board meeting.

VI. Corrective Action Plan (CAP)

Please review this CAP in preparation for a phone call (compliance conference) from NCDOT to finalize the due dates (calendar days). The remedial actions below will remedy the "not satisfactory" notations in Section V.

Remedial Actions and Conciliation Agreement	Due Dates
<ol style="list-style-type: none"> 1. A copy of the Standard USDOT Title VI Assurances is attached. Complete, sign and return as a PDF. 2. An updated policy statement is attached. JCT's Chief Administrative Officer (CAO) shall sign this statement and establish a process to re-sign it whenever JCT experiences a change of CAO. 3. An updated Notice to Public is attached. Add this version to your Plan and use it going forward. 4. In bulleted format, add a list of duties for JCT's Title VI Coordinator to your Title VI Plan. 5. Complete the attached external complaint procedures document and add it to your Title VI Plan. 6. Expand your Public Involvement Plan (PIP) to fulfill the conditions outlined in Chap. III, #8 of FTA C 4702.1B. The PIP must also show that you have determined whether participation barriers exist for any population groups in your service area. Create a spreadsheet of outreach efforts for reporting. 7. Conduct a four-factor analysis for your entire service area, and add this analysis to LEP Plan. Factor 1 requires identifying all LEP language groups (and concentrations) within its service area. (Read Chap. III, #9 of FTA C 4702.1B prior to the compliance conference.) 8. Ask each member of your non-elected committees to complete the attached "Demographic Request." Create a table depicting the results. Visual observation is allowed only when a member declines to self-identify. Place a mark next to names where visual observation was used. Add a section to your Title VI Plan on how members of committees are selected. Provide both the table and selection procedures to NCDOT for review. 9. Add FTA Circulars 4702.1B and 4703.1 to the "Legislation and Guidance" section of the Title VI Plan. 10. Annually disseminate notices to JCT employees and committee members by which they acknowledge that they understand their obligations under Title VI. Detail this process within your Title VI Plan. 11. Present your final updated Title VI Plan to your governing board for approval. Add a date of adoption to the cover of the Plan, and provide the meeting minutes to NCDOT. 12. Title VI training is recommended for JCT. NCDOT's External Civil Rights Section can provide the training. 	<ol style="list-style-type: none"> 1. March 13, 2015 2. March 13, 2015 3. May 12, 2015 4. March 27, 2015 5. May 12, 2015 6. April 10, 2015 7. April 10, 2015 8. April 10, 2015 9. May 12, 2015 10. March 27, 2015 11. May 12, 2015 12. March 27, 2015
<p>Pursuant to 49 CFR 21.11(a) and Chapter VII of FTA Circular 4702.1B, Jackson County Transit hereby agrees to correct the deficiencies identified by NCDOT, as outlined in this Corrective Action Plan, within a total time period not to exceed 90 days, as per established FTA review standards, and will provide such evidence, as necessary, to verify that appropriate corrective actions have been taken.</p>	
<p>Name: <u>Charles R. Apaid</u> Signature (Subrecipient's Executive Official or Title VI Coordinator)</p>	<p>Date: <u>2-11-15</u></p>