



**CENTRALINA**  
REGIONAL COUNCIL

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# Title VI Plan and Non-Discrimination Policies and Procedures

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April 2022

*Original Title VI Plan approved by the Centralina Board of Delegates, October 10, 2018*

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## **POLICY STATEMENT AND NOTICE OF NON-DISCRIMINATION**

Centralina Regional Council (Centralina), as a recipient of federal financial assistance, assures that no person shall, on the grounds of their race, color, age, disability, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in any agency-sponsored program or activity, regardless of whether those programs and activities are federally funded or not. Centralina's Non-Discrimination Policy is in keeping with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, the Americans with Disabilities Act, Section 188 of the Workforce Investment Opportunity Act and related federal policies that address non-discrimination as outlined in the following document.

Centralina's Non-Discrimination Policy applies to all employees, contractors and subrecipients of Centralina, as well as all recipients of and participants in all Centralina programs, services and activities.

Further, in the event that Centralina distributes federal financial aid funds to a subrecipient, Centralina will include the appropriate non-discrimination language and references to federal laws, such as Title VI, in all written agreements and will monitor those subrecipients for compliance as and when required.

This policy statement not only identifies the guiding principles of Centralina's Title VI plan but is also an expression of our organization's broader commitment to non-discrimination.

Centralina values the diversity of all the people and communities we serve and welcomes participation from all interested parties in its programs, services and activities, regardless of cultural identity or background. Centralina is also committed to promoting the comprehensive realization of equal opportunity and equal access to all of its programs, services and activities regardless of race, color, national origin, sex, religion, age, disability, marital or family status, sexual orientation, gender identity or expression or any other characteristic protected by law. Centralina is an Equal Employment Opportunity/Affirmative Action employer.

Centralina will not tolerate any form of proscribed discrimination in employment efforts or in any of its programs, services or activities. Further, Centralina will not tolerate any form of retaliation directed against an individual who complains of discrimination pursuant to this policy or who participates in any investigation concerning discrimination pursuant to this policy.

## PURPOSE OF THE DOCUMENT

The following document (or “Plan”) details the non-discrimination policies, procedures and practices of Centralina Regional Council. This document is also designed to ensure that federal and state funds awarded to Centralina are used in a manner that is non-discriminatory as required under Title VI of the Civil Rights Act of 1964, Workforce Innovation Opportunity Act Section 188, the Americans with Disability Act and related federal policies are outlined herein.

The specific Title VI-related activities discussed in this Plan are developed in response to regulations and directives of the U.S. Department of Transportation (DOT), particularly the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). DOT Title VI implementing regulations are contained in the Code of Federal Regulations, 49 CFR 21.

In addition, the contents of this document support Centralina’s Diversity, Equity and Inclusion (DEI) Initiative and our core values which guide and reinforce our internal cultural and service commitment. The organization’s adopted DEI statement is as follows:

*An inclusive workplace is essential to carrying out Centralina’s mission of expanding opportunity and improving quality of life while upholding our core values. Centralina has a responsibility to create and sustain a work environment where employees of all races, ethnicities, nationalities, cultures, religions, gender identities or expressions, sexual orientations, ages, neurodiversities and physical abilities feel safe, respected and empowered to bring their unique identities to work. We welcome the contributions these differences offer and recognize that having an array of perspectives fosters creativity and innovation. To promote diversity, equity and inclusion within our organization, Centralina commits to:*

- *Providing ongoing training and resources on cultural competency and overcoming personal biases;*
- *Zero tolerance for harassment of any kind;*
- *Resolving conflicts and addressing grievances expediently and effectively;*
- *Ensuring equity in hiring, advancement and salary setting practices; and*
- *Regularly reviewing and assessing the organization’s cultural inclusivity and sensitivity.*

Centralina has adopted this Plan to ensure that the organization is in compliance with the provisions of federal non-discrimination laws and to guide the organization in its administration and management of its activities. As a recipient of federal funds from various funding sources, Centralina is committed to acting with the highest level of integrity and responsibility to ensure that all activities conducted by the organization are without discriminatory intent, purpose, action or result. This Plan is applicable all Centralina programs, activities and services (regardless of whether they are federally funded or not); further is applies to all staff, Board members, participants, subrecipients and contractors whether or not the programs, activities and services engaged are federally funded or not.

This Plan is intended to inform and serve three primary audiences and purposes:

1. General Public & Prospective Employees: Information on the non-discrimination regulations that Centralina is obligated to follow (due to being a federal fund recipient and a public entity) and how Centralina responds to these requirements via policies, procedures and practices.
2. Centralina Staff: As a reference for staff on federal requirements, organizational responsibilities and specific policies, procedures and practices that staff are required to follow related to non-discrimination.
3. Federal and State Oversight Agencies: To provide information to state and federal oversight agencies on how Centralina carries out its responsibilities in regard to federal non-discrimination laws.

The Plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise. The initial Title VI plan was adopted by the Centralina Regional Council Board of Delegates on October 10, 2018; subsequent updates are also subject to approval by the Board.

### **Dissemination and Notices**

This Plan shall be disseminated to Centralina employees via the Policies and Procedures and Employee Handbook upon hire; and shall be provided as a reminder to employees of the policy statement and of the employee's responsibilities in their daily work and duties. Ongoing training shall also be provided to staff as outlined in the Training section.

Title VI information posters, WIOA Equal Opportunity is the Law Notice/Poster shall be prominently and publicly displayed at Centralina's offices and in accordance with 29 CFR.38.35.

The information presented in this Plan is current as of the date of the report and will continue to provide an overview of Title VI and related non-discrimination activities and requirements. However, all of the information is subject to change and revision in accordance with new legislation, rules and policies at the federal, state, or organizational levels, or due to organizational updates of various documents.

### **Plan Implementation**

Implementation of the Plan is supported by the designated Equal Opportunity Officer who has the following responsibilities as summarized below and outlined in future detail throughout the plan:

- Coordinate with Human Resource Manager and Executive Director on updates to the policies, procedures and practices herein;
- Coordinate staff training for new hires and existing staff;
- Receive and investigate complaints of discrimination as outlined in Complaint Policy Section;
- Receive and develop organizational response to requests for reasonable accommodations made by Centralina staff, Board members, program participants and other individuals engaged in providing or receiving services from Centralina.

Contact information for Centralina’s designated Equal Opportunity Officer (or selected designee) shall be available on the organization’s website at [www.centralina.org](http://www.centralina.org).

In addition to the EOO, all Centralina executive staff, directors, HR manager and Board officers play a role in supporting the implementation of this plan as noted herein.

## INTRODUCTION

### **Overview Of Centralina’s Services**

Centralina Regional Council (hereinafter referred to as Centralina) is a public organization that was established in 1968 to serve the needs of the greater Charlotte region, including Anson, Cabarrus, Gaston, Lincoln, Iredell, Mecklenburg, Rowan, Stanly and Union counties. Our mission is to strengthen regional collaboration and improve quality of life, which we accomplish in three distinct ways.

- We identify regional opportunities and spark action by facilitating area-wide planning, collaboration and problem-solving.
- We support local governments by giving them the technical support, training and expertise they need to serve their communities.
- We provide direct health, aging and workforce services to individuals. Through these three levels of engagement and impact, we seek to unite our region by a common vision for a thriving and prosperous place to live, work and play.

Our departments and affiliated organizations work across the region to fulfill our mission, leveraging funding from the federal, state, local and philanthropic sources.

- **The Centralina Area Agency on Aging department** identifies needs and delivers critical services to support older and disabled adults. Through programming, planning, technical assistance and direct services, it helps residents feel like valued members of their communities. The department is subrecipient of funds from the U.S. Department of Health and Human Services.
- **The Centralina Workforce Development Board department** solves the needs of employers and career seekers across our region to create a thriving workforce. Through services and programming, it ensures that the development and training needs of our area are met so that we remain a competitive player in the global economy. This department is subrecipient of funds from the U.S. Department of Labor.
- **The Centralina Regional Planning department** fosters collaboration and looks strategically at our region’s interconnected systems of land use, transportation and economy. It helps local governments create places of lasting value through comprehensive and mutually beneficial strategies and results. This department is subrecipient of funds from the U.S. Department of Transportation.
- **The Centralina Community Economic Development department** drives economic prosperity by addressing our regional opportunities and challenges. It offers technical assistance, staff and expertise to communities and helps leverage resources to improve housing, public infrastructure and downtown revitalizations. This department is subrecipient of funds from the U.S. Department of Housing and Urban Development, Community Development Block Grant (CDBG) Program.

- **The Centralina Government Affairs and Member Engagement department** helps us continuously deliver value to member governments and regional stakeholders. It supports our departments and creates opportunities for regional relationship building, information exchange, advocacy, continuing education and strategic support.

*Affiliates:*

- **The Centralina Economic Development District** uses regional collaboration and innovation to create sustainable job growth and a robust regional economy. It leads and coordinates strategic economic planning, implements action plans and offers EDA funding support for economic planning initiatives. The affiliated organization is funded by the U.S. Department of Commerce, Economic Development Administration.
- **The Centralina Foundation** is a 501(c)3 non-profit charitable organization. It helps us explore new partnerships and funding sources that are key to ensuring Centralina has the resources to support ongoing activities and initiatives across our region.
- **The Centralina Clean Fuels Coalition (CCFC)** was designated in April of 2004 as part of the Department of Energy’s Clean Cities program. The coalition is housed at Centralina Regional Council, a state-designated lead regional organization in North Carolina comprised of Anson, Cabarrus, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, Stanly and Union counties. This affiliated group is funded by the U.S. Department of Energy.

Centralina has a voluntary membership comprised of counties and municipalities from across the Centralina area and is governed by a Board of Delegates. Our region is one of the nation’s fastest growing metropolitan areas, making coordination and collaboration on key issues essential to shaping growth and managing change.

Centralina serves the diverse people and communities of the nine-county greater Charlotte region, including minority populations, low-income populations, the elderly, persons with disabilities and other protected classes. Centralina recognizes its responsibility to provide fairness and equity in all of its programs, services and activities and that it must abide by and enforce federal and state civil rights legislation.

**Overview: Federal Non-Discrimination Legislation**

The U.S. Congress passed the landmark Civil Rights Act of 1964. President Lyndon Johnson signed the Civil Rights Act of 1964 into law on July 2, 1964. The passage of the Act made entities that receive federal funding, such as Centralina, directly subject to the federal Civil Rights Act and requirements to operate in accordance with federal non-discrimination law. **Current Title VI law requires non-discrimination in all programs and activities, whether federally-funded or not, of those who receive federal funds.** Following the passage of the 1964 Civil Rights Act, the specific applicability of the Act has been clarified or expanded to include more than race, color and national origin. Federal fund recipients must adjust their programs and policies on an ongoing basis to conform with these requirements.

The term “program or activity” and the term “program” mean all of the operations of:



- A department, agency, special purpose district, or other instrumentality of a state or of a local government; or
- The entity of such state or local government that distributes such assistance and each such department or agency (and each other state or local government entity) to which the assistance is extended, in the case of assistance to a state or local government.

*Any part of which is extended federal financial assistance. 42 U.S.C. § 2000d-4a(1)*

Many programs have two recipients. The primary recipient or conduit directly receives the federal financial assistance. The primary recipient then distributes the federal assistance to a subrecipient to carry out a program. Both the primary recipient and subrecipient must act in accordance with Title VI. Centralina is a primary and subrecipient.

By legislative mandate, Title VI examines the following public policy issues:

- Accessibility for all persons
- Accountability in public funds expenditures
- Disparate impact
- Economic empowerment
- Environmental justice
- Infrastructure development
- Minority participation in decision making
- Program service delivery
- Public and private partnerships built in part or whole with public funds
- Equal distribution of federal funds regardless of race, color, or national origin

Title VI was enacted to ensure equal distribution of federal funds regardless of race, color or national origin. Because of this, Title VI:

- Encourages the participation of minorities as members of planning or advisory bodies for programs receiving federal funds.
- Prohibits discriminatory activity in a facility built in whole or part with federal funds.
- Prohibits entities from denying an individual any service, financial aid, or other benefit because of race, color or national origin.
- Prohibits entities from providing a different service or benefit or providing these in a different manner from those provided to others under the program.
- Prohibits entities from requiring different standards or conditions as prerequisites for serving individuals.
- Prohibits locating facilities in any way that would limit or impede access to a federally funded service or benefit.
- Prohibits segregation or separate treatment in any manner related to receiving program services or benefits. Requires assurance of non-discrimination in purchasing of services.
- Requires entities to notify the respective population about applicable programs.
- Requires information and services to be provided in languages other than English when significant numbers of beneficiaries are of limited English-speaking ability.

In addition to Title VI, there are other significant federal civil rights-related and non-discrimination legislation, regulations, executive orders, and federal agency guidance that Centralina is subject to and to which this Plan responds.

AGE DISCRIMINATION ACT OF 1975 (42 U.S.C. 6101): The Age Discrimination Act of 1975 provides that no person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.

AMERICANS WITH DISABILITIES ACT OF 1990, Subchapter 2, Part A [Pub. L. 101-336 (1990); codified as 42 U.S.C. §§12131-12134]: Non-discrimination based on disability. The Americans with Disabilities Act of 1990 provides that no qualified individual with a disability shall, by reason of such disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination by a department, agency, special purpose district, or other instrumentality of a state or a local government.

CIVIL RIGHTS RESTORATION ACT OF 1987 (P.L. 100-259): Clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

FEDERAL-AID HIGHWAY ACT OF 1973 (23 U.S.C. 324): Prohibits discrimination on the basis of sex.

SECTION 188 OF THE WORKFORCE INNOVATION AND OPPORTUNITY ACT, 29 U.S.C and its implementing regulations at 29 CFR part 38: Prohibits discrimination on the basis of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title I-financially assisted program or activity.

SECTION 504 OF THE REHABILITATION ACT OF 1973 (29 U.S.C. 794): Section 504 of the Rehabilitation Act of 1973 provides that no qualified handicapped person, shall, solely by reason of his/her handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.

1970 UNIFORM ACT (42 USC 4601): applies when actions undertaken by federal agencies or entities that receive federal financial assistance cause the temporary or permanent displacement of persons from their property. The Uniform Act requires that all groups of people should be treated uniformly and fairly in any residential relocations resulting from the exercise of eminent domain pursuant to a federal-aid program or project.

23 CFR Part 200: 23 CFR 200 are administration regulations promulgated by the Federal Highway Authority that specify the Title VI implementation requirements for state departments of transportation at state and local levels.

49 CFR Part 21: 49 CFR 21 are administration regulations promulgated by the U.S. Department of Transportation that specify the Title VI implementation requirements for state departments of transportation at state and local levels.

EXECUTIVE ORDER 12250: (28 CFR 42.401) Department of Justice coordination of enforcement of non-discrimination in federally assisted programs.

EXECUTIVE ORDER 12898 (EJ) in 1994: Federal actions to address equity and fairness in minority and low-income populations (“Environmental Justice”) Ensures non-discrimination against minority populations and low-income populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on these protected classes.

EXECUTIVE ORDER 13166 (LEP) in 2000: Requires meaningful access to services for people with limited English proficiency by developing reasonable accommodations through which persons who are limited in their ability to communicate in the English language have meaningful access to agency programs and can participate in opportunities for public involvement.

EXECUTIVE ORDER 13985 (ARE) in 2021: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. Articulates a goal by the Federal government to promote equity for the traditionally underserved populations in the access to economic opportunities and benefits, and to ensure that the programs and activities of Federal agencies are open and inclusive to groups of persons who may be distinguished by their race, color, religion, disability, geographical locations, social class, and lifestyle choices. Among other things, the executive order calls attention to the needs of the rural areas.

## ACCOMMODATING INDIVIDUALS WITH DISABILITIES

ADA (Americans with Disabilities Act)/504 Statement Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA) and related federal and state laws and regulations forbid discrimination against those who have disabilities. Furthermore, these laws require federal-aid recipients and other government entities to take affirmative steps to reasonably accommodate those with disabilities and ensure that their needs are equitably represented in related programs, services and activities.

Centralina shall provide reasonable accommodations to qualified individuals with disabilities who are applicants or participants of any aid, benefit, service, training or employment, are Centralina employees, or applicants for employment, unless providing the accommodation would cause undue hardship (29 CFR 38.14.a). Further, Centralina has a similar obligation to make reasonable modifications in policies, practices or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless making the modifications would fundamentally alter the nature of the service, program or activity (29 CFR 38.14.b).

Centralina will make every effort to ensure that its facility, programs, services, and activities are accessible to those with disabilities. Centralina will also make every effort to ensure that its advisory committees, public involvement activities and all other programs, services and activities include representation by communities with disabilities and disability service

groups. Centralina encourages the public to report any facility, program, service or activity that appears inaccessible to the disabled. Furthermore, Centralina will provide reasonable accommodation to disabled individuals who wish to participate in public involvement events or who require special assistance to access facilities, programs, services or activities.

**Requesting Accommodations**

1. *Directing the request:* individuals requesting accommodations should direct their requests as follows:

<b>General Public, Program Participants</b>	<b>Centralina Staff or Applicants for Open Positions</b>	<b>Centralina Board, Commission or Committee Members</b>
Equal Opportunity Officer	HR and Operations Manager	Equal Opportunity Officer
For Contact Information: <ul style="list-style-type: none"> <li>• In-person: Centralina office location</li> <li>• By phone: 704-372-2416, 1-800-508-577 (Centralina Area Agency on Aging Toll-Free Help Line)</li> <li>• By email: <a href="mailto:admin@centralina.org">admin@centralina.org</a></li> <li>• By fax: 704-347-4710</li> </ul>		

Because providing reasonable accommodation may require outside assistance, organization or resources, Centralina asks that requests be made at least 15 calendar days prior to the need for accommodation.

2. *Assessing and responding to the request:* The Equal Opportunity Officer or HR Manager who will complete the following steps:
  - a. Review the request to determine if the requestor with a disability is “qualified” and if the disability meets the definition under the ADA.
  - b. If affirmed, then initiate an interactive process to engage the requestor to share information and documentation to determine what (if any) accommodations may be needed. Both the requestor and Centralina’s point of contact shall make a good faith effort to communicate in a timely fashion. Input from the requestor on desired accommodations shall be sought.
  - c. Determine accommodations options and if the proposed accommodations are “reasonable” or create an “undue hardship.” Centralina shall follow the guidance in 29.CFR 38.14 to determine if reasonable accommodation would cause undue hardship. Reasonable accommodation is defined in 29.CFR 38.4(yy). Centralina point of contact may consult with appropriate internal and external parties for input on accommodation options. For example, the EOO may consult with the Clerk of the Board on accommodations for hearing impaired board members; or the HR Manager may consult with a supervisor to develop an accommodation plan for an employee.
  - d. Propose recommendation to HR Manager or Executive Director (if HR Manager is the point of contact) for approval. For purchases, all appropriate finance policies and procedures must be adhered to.

- e. Notify the requestor in writing if the request for accommodation has been approved or denied. Details of the accommodation and the anticipated start date shall be included; response can also include steps to review and modify the accommodation should individual or business needs shift.
  - f. Provide documentation of the request and resolution to the HR Manager for confidential record keeping purposes.
3. *Appeals*: The requestor has the right to appeal a denial of accommodation to the Executive Director (if HR Manager was the initial approver) or Centralina Board Chair (if Executive Director was the initial approver). The reviewer shall consider all documentation and respond to the requestor within 5 business days of receiving a written request.

### **Role of Centralina Staff**

Although formal requests for accommodation are directed to an official point of contact as noted above, all Centralina staff will be trained to understand their obligations to provide meaningful access to information and services and in working with and accommodating persons with disabilities. All staff, even if they do not regularly come in contact with persons with disabilities or receive requests for accommodations, will be fully aware of and understand these requirements so they can reinforce its importance and ensure its implementation.

## **TITLE VI GENERAL REQUIREMENTS**

### **Certifications and Assurances**

Federal funding agencies require entities applying for financial assistance to enter into standard agreements or to provide written assurances that the recipient will comply with the funding agency's implementing regulations – including non-discrimination under Title VI. Applications for federal financial assistance must be accompanied by an executed assurance that the funds would be administered in compliance with Title VI non-discrimination regulations.

Centralina is a recipient of federal assistance and as such it, as well as its responsible agents, contractors and consultants, is required to assure non-discrimination.

Centralina hereby gives assurances that no person shall on the grounds of race, color, national origin, age, gender or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity conducted by Centralina regardless of whether those particular programs and activities are federally-funded. It is the responsibility of every employee with Centralina and all Centralina external agents to incorporate and implement actions consistent with non-discrimination in programs.

More specifically and without limiting the above general assurance, Centralina hereby gives the following specific assurances:

1. That it will promptly take any measures necessary to effectuate this agreement.

2. That each of Centralina programs, activities and facility will be conducted and or operated in compliance with non-discrimination requirements under all Federal laws and regulations.
3. That these assurances are given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts or other federal financial assistance. These assurances are binding on Centralina, its recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest and other participants.
4. That Centralina will insert appropriate non-discrimination clauses in every contract subject to Title VI and the Regulations.
5. Centralina will display Title VI information for employees and the public and information shall be translated into languages other than English as needed and consistent with the Limited English Proficiency (LEP) requirements of Title VI.
6. In the course of conducting public outreach and involvement activities, Centralina shall seek out and consider the input of minority, low income and LEP populations as feasible. Public participation shall be encouraged early and often in consideration of social, economic and environmental impacts on all populations.

### **Title VI Program Administration and Responsibilities**

Centralina's designated Equal Opportunity Officer (or selected designee) will be responsible for the cross-department coordination of the Title VI program, implementation of related plans and will receive and investigate Title VI complaints that might come through the complaint procedures process. The Equal Opportunity Officer (or selected designee) is also responsible for substantiating that these elements of the plan are appropriately implemented and maintained and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

The Equal Opportunity Officer (or selected designee) has the authority and responsibility to implement the Title VI program by:

- Ascertaining that Centralina operations comply with Title VI requirements.
- Receiving service of process for Title VI lawsuits filed against the agency.
- Addressing Title VI complaints received by the agency in accordance with defined procedures and ensuring that the complaints are processed, investigated, and resolved in a fair and timely manner.
- Discussing significant Title VI implementation issues and challenges with the Executive Director, department directors and others, as necessary.
- Managing a training and ongoing education program for staff, including leading orientation for new Centralina staff on the Title VI program.
- Periodically reviewing the Title VI progress and making recommendations on how the organization can better serve the communities of concern; and
- Integrating best practices and constructive feedback from staff and others into the Title VI program.

## **Title VI Notice to the Public**

Centralina has created and will publish and post a public notice of non-discrimination as part of the general requirements of the Title VI plan with the following objectives:

- Ensure that the level and quality of its programs and services are provided in a non-discriminatory manner.
- Promote the full and fair participation by all potentially affected communities in the public involvement process.
- Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental impacts, including social and economic effects of its programs, policies and activities on low-income and minority populations.
- Prevent the denial of, reduction in or significant delay in the receipt of benefits of low-income and minority populations; and
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).

Centralina's designated Equal Opportunity Officer (or selected designee) shall assist Centralina staff in the creation and dissemination of Title VI Program information to employees, subrecipients, contractors, affected parties and the general public. Public dissemination efforts may include: posting public statements setting forth Centralina's non-discrimination policy; inclusion of Title VI Assurances in related contracts and grants; and publishing a Title VI policy statement on Centralina's website.

Any person that would like to request more information regarding Centralina's civil rights programs, Title VI obligations or who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may contact Centralina's designated Equal Opportunity Officer (or selected designee) to obtain related filing information.

Centralina will provide written translation of vital documents, upon request, in compliance with the Safe Harbor Provision found in FTA Circular 4702.1B, Chapter III, Section 19.

Another Language? [www.centralina.org](http://www.centralina.org) has Google Translate or call 704-372-2416. ¿Otro idioma? [www.centralina.org](http://www.centralina.org) tiene Google Translate o llame al 704-372-2416. Một ngôn ngữ không? [www.centralina.org](http://www.centralina.org) có Google Translate hay gọi 704-372-2416. 另一种语言? [www.centralina.org](http://www.centralina.org) 有谷歌翻译, 或致电 704-372-2416. 另一種語言? [www.centralina.org](http://www.centralina.org) 谷歌翻譯, 或致電 704-372-2416. Une autre langue? [www.centralina.org](http://www.centralina.org) a Google Translate ou appelez 704-372-2416. Другой язык? [www.centralina.org](http://www.centralina.org) имеет Google Translate или позвоните 704-372-2416. 𑂣𑂗𑂢𑂰 𑂔𑂱𑂲𑂳? [www.centralina.org](http://www.centralina.org) Google 𑂣𑂗𑂢𑂰𑂲𑂳 𑂣𑂗𑂢𑂰 704-372-2416. 𑂣𑂗𑂢𑂰 𑂣𑂗𑂢𑂰 𑂣𑂗𑂢𑂰 𑂣𑂗𑂢𑂰. 𑂣𑂗𑂢𑂰 𑂣𑂗𑂢𑂰 𑂣𑂗𑂢𑂰 𑂣𑂗𑂢𑂰. Outra Língua? [www.centralina.org](http://www.centralina.org) tem Google Translate ou ligue para 704-372-2416. Wani Language? [www.centralina.org](http://www.centralina.org) yana da Google Translate ko kira 704-372-2416. Asụsụ ọzọ? [www.centralina.org](http://www.centralina.org) nwere Google Itughari ma o bu na-akpo 704-372-2416. Miran ti Ede? [www.centralina.org](http://www.centralina.org) ni o ni Google sélédemírán tabi pe 704-372-2416. Luqad kale? [www.centralina.org](http://www.centralina.org) ayaa Google Translate ama wac 704-372-2416.

### **Subrecipients Compliance Procedures**

Centralina works proactively to ascertain that its subrecipients and consultants (“Third Party Participants”) who are engaged to provide any products or services to the agency are informed about federal non-discrimination regulations and are also made aware that they are required to remain in compliance with Title VI throughout the period of their engagement. Compliance by a subrecipient is fostered by direct consultation and facilitated through the actions described below:

- Title VI non-discrimination language is included in Contracts, Request for Proposals (RFP), and Requests for Qualifications (RFQ) for all participants
- Subrecipients and consultants are required to execute a certificate indicating that they are following all the requirements imposed under 49 CFR, Part 21.
- Information regarding subrecipient performance is collected through monthly invoicing and progress reports, and as appropriate, through desk audits or site visits by the project manager and financial audits.
- Any complaints or lawsuits based on an alleged violation of Title VI by a subrecipient are referred to the Equal Opportunity Officer who will investigate and adjudicate the matter.
- Subrecipients or consultants found to be out of compliance with Title VI are advised on how to correct the deficiency. Centralina’s Intervention may include providing information, technical assistance, or practical guidance. If, however, the subrecipient or consultant fails to correct the deficiency within a reasonable time, the Equal Opportunity Officer may implement appropriate remedies provided in the executed agreements.

Outreach activities to provide small, disadvantaged, minority, women, and disabled veteran-owned businesses with information about opportunities to compete for consulting contracts.

### **Public Involvement Goals**

Centralina conducts community engagement and public outreach on an ongoing basis through the Area Agency on Aging, Workforce Development Board, Regional Planning, Community and Economic Development and Government Affairs and Member Engagement departments. Public outreach efforts include but are not limited to:

- Public hearing notices, as required by grants
- Community surveys
- Open houses
- Focus groups
- Community education through scheduled speaking opportunities, health fairs etc.

Centralina considers the following guiding principles for public participation:

- Public participation is a dynamic activity that requires teamwork and commitment at all levels of the organization.
- One size does not fit all — input from diverse perspectives enhances the process.
- Effective public outreach and involvement requires relationship building with local governments, stakeholders and advisory groups and others.



- Engaging interested persons in the issues is challenging, yet possible, by making it relevant, removing barriers to participation, and communicating in clear, compelling language and visuals; and
- An open and transparent public participation process empowers low-income communities and communities of color to participate in decision making that affects them.

Centralina is committed to consistent public participation opportunities and employs the following strategies to encourage an open process:

*Public Education:* Successful and meaningful public participation can only be assured through a public education effort where the issues and complexities of the program areas can be simply explained and openly discussed. Public education will take place through utilizing the Centralina website, public workshops and various media outlets. By increasing publicity and awareness about Centralina programs and activities, more citizens will become educated about the issues.

*Visualization:* To the extent possible, Centralina may employ visualization techniques such as 2D overlays, maps and GIS to improve comprehension of complex issues, particularly as it relates to transportation projects. These techniques further help to promote successful and meaningful public participation.

*Website:* The staff will develop and maintain websites for each of the various program areas (Area Agency on Aging, Workforce Development Board, Regional Planning, Community and Economic Development and Government Affairs and Member Engagement) that contain such information as historical data, published documents, draft documents for review, meeting schedules, reports and links to related internet sites, as well as staff member contact information.

*Board and Committee Meetings:* Centralina has regularly scheduled Board meetings that are open to the public. The meeting schedule is available from the website or by request. Also, meeting agenda and minutes are published and available online.

*Public Meetings and Workshops:* Centralina hosts a variety of public meetings and workshops across its various program areas that bring diverse groups of stakeholders together for a specific purpose. These meetings are held to engage a wide audience in information sharing and discussion. They can be used to increase awareness of an issue or proposal, and can be a starting point for, or an ongoing means of engaging, further public involvement.

*Media Participation/Public Notification:* Centralina staff may provide the major newspapers and media outlets in the area with timely notice regarding public meetings/workshops. In addition, Centralina may issue press releases about various program activities, which will include information on the meeting date(s) and time(s) and other pertinent information. (Please note that press releases do not guarantee that any of the media agencies contacted will actually publish or announce the press release).

## **Language Assistance Plan for Persons with Limited English Proficiency (LEP)**

Title VI also prohibits discrimination against persons with limited English proficiency (LEP). LEP status includes persons who do not speak English as their primary language and who have limited ability to read, write, speak or understand English. LEP persons are entitled to free language assistance.

Because of language differences and the inability to effectively speak or understand English, persons with LEP may be subject to exclusion from programs or activities, experience delays or denials of services. These individuals may be entitled to language assistance with respect to a particular type of service. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services and information those entities provide.

Executive Order 13166 directs federal agencies to “implement a system by which (limited English-proficient or ‘LEP’) persons can meaningfully access... services consistent with, and without unduly burdening, the fundamental mission of the agency.” When read in its entirety and interpreted consistently with Title VI, the Executive Order applies to all programs and activities of a federal agency.

Federal guidance outlines a four-factor analysis to determine appropriate services for persons with limited English proficiency.

### Four Factor Analysis

#### Factor No. 1: Number of LEP Persons in Service Region

Centralina is a regional council of cities, towns, and counties in the nine-county area consisting of Anson, Cabarrus, Gaston, Iredell, , Lincoln, Mecklenburg, Rowan, Stanly and Union counties.

Centralina is committed to breaking down language barriers by implementing consistent standards of language assistance, as needed, across its program areas.

#### *Factor No. 2: Frequency with which LEP Persons come into contact with Centralina services and programs*

There are a large number of places where the residents of the greater Charlotte Region can come into contact with Centralina programs and services including public informational meetings, printed out-reach materials, web-based outreach materials, local news media and communication with Centralina staff.

In the history of records of Centralina activities, there have been few requests for translations of documents or for special accommodations at public meetings. However, Centralina serves the entire community and outreach activities have been and will continue to be proactive in reaching traditionally underserved populations including people with low English proficiency and people with disabilities. Centralina will regularly review the need for further outreach to ensure full participation in program activities by all interested people.

#### *Factor No. 3: The Nature and Importance of the Programs and Services Provided by Centralina*

The mission of Centralina is to lead regional collaboration and spark local action to expand opportunity and improve quality of life. We do this by finding innovative solutions to existing and future challenges and coordinating long-term strategies across public and private sectors at the local, state and federal levels.

The public participation processes that take place related to Centralina programs and services provides the region with a consensus on what the major issues facing the region are and what the focus of possible improvements should be.

If limited English is a barrier to using the programs/services provided by Centralina then the consequences for the individual are the limited ability to provide review and comment regarding proposed actions. Without sufficient services, the intent to foster early and meaningful discussions so that the public is made a partner in the decision-making process will be hindered.

Recognizing this as a key factor, Centralina is committed to breaking down language barriers by implementing consistent standards of language assistance, as needed, across its program areas.

*Factor No. 4: Resources Available to Centralina and Costs to Assure Meaningful Access to the Program by LEP Persons.*

Centralina's outreach efforts ensure residents who are not proficient in English can effectively participate in Centralina's planning processes. Centralina ensures that all significant language groups are identified and incorporated into the public participation plan.

Centralina is committed to conducting outreach to traditionally under-served individuals and communities, which include but are not limited to low income, minority and LEP persons. Centralina will use appropriate methods to notify the public of its activities and of opportunities for public involvement.

Centralina staff will be trained to understand their obligations to provide meaningful access to information and services for LEP persons. All staff, even if they do not interact regularly with LEP persons, will be fully aware of and understand these requirements so they can reinforce its importance and ensure its implementation. In-depth training will be provided for staff that may have more frequent contact with LEP persons.

Questions, concerns, comments or requests can be made to Centralina's designated Equal Opportunity Officer (or selected designee):

- In-person: Centralina office location
- By phone: 704-372-2416, 1-800-508-577 (Centralina Area Agency on Aging Toll-Free Help Line)
- By email: [admin@centralina.org](mailto:admin@centralina.org)
- By fax: 704-347-4710

## **Environmental Justice**

Centralina seeks to improve social equity in accordance with our organizational values, as supported by Executive Order 12898 and EO 13985. Centralina conducts all programs, policies and activities in a manner that ensures such programs, policies and activities do not have the effect of excluding persons (including populations) from participation in, denying persons (including populations) the benefits of, or subjecting persons (including populations) to discrimination under, such programs, policies and activities, because of their race, color or national origin.

The guiding Environmental Justice principles followed by Centralina are summarized as follows:

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

Centralina will follow and comply with these Environmental Justice principles in the following ways:

1. *Identify Populations:* When planning specific programs or projects, identifying those populations that will be affected by a given program or project.
2. *Assess Impact and Mitigation:* If a disproportionate effect is anticipated, following mitigation procedures.
3. *Assessment of Mitigation Efforts:* If mitigation options do not sufficiently eliminate the disproportionate effect, discussing and, if necessary, implementing reasonable alternatives.

Centralina staff will be trained to understand their obligations to provide meaningful access to information and services and in gaining a better understanding of the environments and settings that describe underserved communities. All staff, even if they do not interact regularly with underserved communities, will be fully aware of and understand these requirements so they can reinforce its importance and ensure its implementation. In-depth training will be provided for staff that may have more frequent contact with underserved communities.

Questions, concerns, comments or requests can be made to Centralina's designated Equal Opportunity Officer (or selected designee):

- In-person: Centralina office location
- By phone: 704-372-2416, 1-800-508-577 (Centralina Area Agency on Aging Toll-Free Help Line)
- By email: [admin@centralina.org](mailto:admin@centralina.org)
- By fax: 704-347-4710

## COMPLAINT POLICY AND PROCEDURE

Any person who believes that he or she, as a member of a protected class, has been discriminated against based on race, color, national origin, gender, age, disability, religion, low-income status, or Limited English Proficiency in violation of Title VI of the Civil Rights Act of 1964, as amended and its related statutes, regulations and directives, Section 504 of the Vocational Rehabilitation Act of 1973, Americans with Disabilities Act of 1990, as amended, the Civil Rights Restoration Act of 1987, as amended, Section 188 of the Workforce Innovation and Opportunity Act, 29 U.S.C and its implementing regulations or any other state or federal non-discrimination statute, may submit a complaint. A complaint may also be submitted by a representative on behalf of such a person.

Any persons who file discrimination complaints will be allowed to maintain active participation in the programs, services or activities in which they are participating while their complaints are being processed.

It is the policy of Centralina to conduct a prompt and impartial investigation of all allegations of discrimination and to take prompt effective corrective action when a claim of discrimination is substantiated.

### **Complaint Procedures**

Any such complaint shall follow the procedures below:

1. *Filing a Complaint:* Any individual who feels that they have been discriminated against may submit a complaint to Centralina's designated Equal Opportunity Officer (or selected designee). If the complaint is communicated to another Centralina staff member it shall be directed to Centralina's designated Equal Opportunity Officer (or selected designee) upon receipt.
2. *Timeline to File:* The complaint should be submitted within 180 days of the alleged discrimination. If the alleged act of discrimination occurred more than 180 days, the complainant must explain the reason for the delay in filing the complaint.
3. *Instructions to File:* Individuals who wish to file a complaint may use the designated Complaint Form. However, individuals are not required to use this form and may utilize alternative formats to file a complaint. In general, the complaint shall include the name, address and contact information of the individual that has a complaint and a description of the alleged discriminatory conduct including the date of harm. An individual submitting a complaint alleging discrimination may include any relevant evidence, including the names of witnesses and other supporting documentation. Failure to provide complete information may delay the investigation of the complaint.
4. *Request for Language Access and/or Reasonable Accommodation or Modification:* If necessary, the complainant may request a reasonable accommodation or modification for filing the complaint. The complainant may similarly request assistance in filing the complaint if they have limited English proficiency. In both cases, the complainant must request accommodation or language assistance to the

Equal Opportunity Officer in adherence with the timeline to file guidelines noted in #2 above.

These procedures do not deny the right of the complainant to file formal complaints with other state or Federal agencies or to seek private counsel for complaints alleging discrimination.

Every effort will be made to resolve complaints informally at the organizational level. The option of information mediation meetings between the affective parties and a designated mediator may be utilized for resolution.

### **Receipt and Verification of Complaints**

The following is a description of how a discrimination complaint will be handled once received by Centralina.

1. *Initial Written Notice to Complainant:* The complainant will be notified in writing by Centralina's designated Equal Opportunity Officer (or selected designee) within 10 business days of receipt of the complaint. The EOO will determine if the matter is outside the scope or jurisdiction. If the matter is determined to be within the scope and jurisdiction, the EOO will notify the complainant, HR manager and the Executive Director and begin an investigation of the complaint.
2. *Investigation:* Within 60 days of the receipt of the complaint, Centralina's designated Equal Opportunity Officer (or selected designee) will conduct an investigation of the allegation based on the information provided. Centralina's designated Equal Opportunity Officer (or selected designee) may also assign a capable person to investigate the complaint. The designated investigator will conduct an impartial and objective investigation and collect factual information. If the investigation requires additional time beyond the 60 days after the filing of the complaint, the investigator shall notify the complainant in writing with the approximate timeline for concluding the investigation. If more information is needed to resolve the case, the investigator may contact the complainant. Failure by the complainant to cooperate or to provide the requested information by a specified date may result in the administrative closure of the complaint.
3. *Confidentiality:* A complainant's identity shall be kept confidential except to the extent necessary to conduct an investigation. All complaints shall be kept confidential.
4. *Concluding the Investigation & Related Documentation:* At the conclusion of its investigation, the investigator will prepare a written response to the complainant that is either a closure letter or a letter of finding (LOF). The decision letter shall be provided to Centralina's Executive Director for review and signature.
  - A closure letter shall summarize the allegations, investigation process and main findings that led to the conclusion of no discrimination or violation of federal law. Centralina will consider the complaint resolved.
  - A LOF shall summarize the allegations, investigation process and main findings that led to the conclusion that discrimination did occur. The LOF shall also outline

Centralina's proposed corrective action, if any. Following the implementation of any corrective actions, Centralina will consider the complaint resolved.

- The complainant may request a meeting with the investigator to review the investigation documentation and findings.

### **Request for Reconsideration and Appeals**

*Reconsideration:* If the complainant disagrees with the response, they may request reconsideration by submitting the request in writing, to Centralina's Executive Director within 10 calendar days after receipt of the response. The request for reconsideration shall be sufficiently detailed to contain any items the complainant feels were not fully understood or responded to. The Executive Director shall conduct a full review of the complaint and supporting documentation prior to making a decision. The Executive Director will notify the complainant of his or her decision either to accept or reject the request for reconsideration within ten (10) calendar days.

*Appeals:* If the request for reconsideration is denied, the complainant may appeal Centralina's Executive Director's response by submitting a written appeal to Centralina Board of Delegates Chairperson no later than 10 calendar days after receipt of Centralina's Executive Director's written decision rejecting reconsideration. The Chairperson shall conduct a thorough review of all of the materials and documentation associated with the case prior to making a decision.

The complainant may also file an external Title VI complaint or appeal Centralina's decision with other state or Federal agencies, as noted in the Title VI Notice to the Public.

### **Dismissal of Complaints**

A complaint may be dismissed for the following reasons:

- The complainant requests the withdrawal of the complaint.
- The complainant fails to respond to repeated requests for additional information needed to process and investigate the complaint.
- The complainant cannot be located after reasonable attempts.

### **Retaliation**

The laws enforced by Centralina prohibit retaliation or intimidation against anyone because that individual has either taken action or participated in action to secure rights protected by these laws. No one may intimidate, threaten, coerce or engage in other discriminatory conduct against anyone because they have taken action or participated in an action to secure rights protected by the civil rights laws.

Any individual alleging such harassment or intimidation may submit a complaint by following the procedure outlined above.

### **Records**

All records and investigative working files are maintained in a confidential area. Records are kept for the designated period of time.

Centralina shall prepare and maintain a complaint log of alleged discrimination to include:

- Active investigations conducted by federal agencies and entities;

- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program that is submitted to funding agencies, as requested.

## **TITLE VI AND NON-DISCRIMINATION TRAINING**

Centralina is responsible for overall Title VI related training and staff development for Centralina employees. Centralina will organize and conduct a minimum of one internal Title VI non-discrimination training session annually. New employees will be provided with education and literature at new employee orientation. The annual training will cover topics such as:

- Overview of Title VI and the Civil Rights Act of 1964;
- Title VI Program Expectations;
- The rights of individuals with disabilities to receive reasonable accommodations and modifications;
- The obligation of Centralina and its staff and managers to engage in an interactive process to determine the appropriate reasonable accommodation when necessary and the policies and procedures developed regarding notice and communication;
- Limited English Proficiency (LEP) guidelines
- Environmental Justice principles
- The obligation of Centralina and its staff and managers to refrain from intimidation and retaliation for protected activity.

Additionally, Centralina will ensure its designated Equal Opportunity Officer (or selected designee) receives the appropriate training regarding their responsibilities and obligations.

Centralina employees will be required to sign an acknowledgment of receipt indicating they have received and understand the information presented.

Centralina employees will be expected to follow the Title VI and non-discrimination plan and guidelines set forth. In addition, Centralina employees will be expected to make every effort to alleviate any barriers to service or program use that would restrict public access or usage, take prompt and reasonable action to avoid and minimize discrimination incidences and immediately notify the Equal Opportunity Officer (or selected designee), of any questions, complaints or allegations of discrimination.



# APPENDICES

## Appendix A: Centralina's Original Board Adopted Resolution



### **A RESOLUTION REGARDING TITLE VI AND ADOPTION OF A TITLE VI POLICY STATEMENT**

**WHEREAS**, the Centralina Council of Governments (Centralina COG) is the state-designated lead regional organization for the nine-county region in and around Charlotte, North Carolina; and

**WHEREAS**, Centralina COG's role is to coordinate the efforts of federal, state and local governments and organizations to grow our region's economy and jobs, control the cost of government and improve quality of life; and

**WHEREAS**, to fund its many program activities and initiatives, Centralina COG receives direct or pass-through federal funding from agencies such as the US Department of Transportation (Federal Highway Administration and Federal Transit Administration); the US Department of Health and Human Services; and the US Department of Labor; and

**WHEREAS**, Centralina COG, as a recipient and sub-recipient of federal funding will ensure full compliance with Title VI of the Civil Rights Act of 1964 which prohibits discrimination based on race, color and national origin, specifically 42 USC 2000d, which states 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; and*

**WHEREAS**, Centralina COG will also comply with the Title VI of the Civil Rights Act of 1964, as amended and its related statutes, regulations and all additional protections set forth; and

**WHEREAS**, Centralina COG has developed a Title VI Policy Statement that will direct the administration and implementation of the Title VI of the Civil Rights Act of 1964 within the organization and authorizes Centralina COG's Executive Director to further develop and provide any other Title VI assurances, plans and programs, as required.

**NOW, THEREFORE, BE IT RESOLVED**, that Centralina COG certifies that it will comply with the provisions of the Title VI of the Civil Rights Act of 1964 (as amended) and the associated responsibilities of the law and adopts the 2018 Title VI Policy Statement.

*Approved by the Centralina Board of Delegates October 10, 2018*

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**Appendix B: Title VI Plan Acknowledgment**

I hereby acknowledge my review and approval of Centralina’s Title VI Plan 2022-2025. As Centralina’s Executive Director and Authorizing Official, I am committed to ensuring that no person is excluded from participation in or denied the benefits of Centralina’s programs or services on the basis of race, color, religion, sex, national origin, age, disability, income status, limited English proficiency or political affiliation or belief as protected by Title VI and all other State or Federal statutes and regulations.

\_\_\_\_\_  
Signature of Executive Director

\_\_\_\_\_  
Date

## **Appendix C: Title VI Notice to the Public**

It is the policy of Centralina to operate its programs and services in full compliance with Title VI of the Civil Rights Act of 1964, as amended and its related statutes, regulations and directives, Section 504 of the Vocational Rehabilitation Act of 1973, Americans with Disabilities Act of 1990, as amended, the Civil Rights Restoration Act of 1987, as amended, Section 188 of the Workforce Innovation and Opportunity Act, 29 U.S.C and its implementing regulations or all other State and Federal non-discrimination statute which requires that no person shall, on the basis of race, color, religion, sex, national origin, age, disability, income status, limited English proficiency or political affiliation or belief, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in any program or activity which is federally funded. Additionally, Executive Order 12898 establishes a mission of Environmental Justice for minority and low-income populations in all federal programs, policies and activities.

Toward this end, it is Centralina's objective to:

- Ensure that the level and quality of its programs and services are provided in a non-discriminatory manner;
- Promote the full and fair participation by all potentially affected communities in the public involvement process;
- Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental impacts, including social and economic effects of its programs, policies and activities on low-income and minority populations;
- Prevent the denial of, reduction in or significant delay in the receipt of benefits of low-income and minority populations; and
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).

Centralina's designated Equal Opportunity Officer (or selected designee) is responsible for initiating and monitoring Title VI activities, preparing required reports and ensuring that Centralina adheres to applicable laws and regulations.

Any person that would like to request more information regarding Centralina's civil rights programs, Title VI obligations or who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may contact Centralina's designated Equal Opportunity Officer (or selected designee) and/or file a formal complaint directly with one or more of the following:

- Centralina Regional Council, ATTN: Equal Opportunity Officer, 9815 David Taylor Drive, STE 100, Charlotte, NC 28262
- CATS, via:
  - Telephone at (704) 336- RIDE(7433) TDD: (704) 336-5051
  - Internet at [www.ridetransit.org](http://www.ridetransit.org)
  - E-mail at [telltransit@charlottenc.gov](mailto:telltransit@charlottenc.gov)
  - U.S. Mail at ATTN: CATS Civil Rights Officer, 600 East Fourth Street, Charlotte, NC 28202
- Federal Transit Administration (FTA) Office for Civil Rights, ATTN: Complaint Team, East Building, 5<sup>th</sup> Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

- U.S. Department of Health and Human Services (HHS) Office for Civil Rights, ATTN: Centralized Case Management Operations, 200 Independence Ave., SW, STE 515F, HHH Building, Washington, DC 20201
- WIOA – NC Department of Commerce, ATTN: Division of Workforce Solutions, 4316 Mail Service Center, Raleigh, NC 27699-4316

## **Appendix D: Title VI Notice to the Public – List of Locations**

Centralina’s Title VI notice to the public will be posted at the following locations:

- Centralina’s reception or lobby area
- Centralina’s break room
- Centralina’s meeting and conference rooms
- Centralina's website: [www.centralina.org](http://www.centralina.org)

**Appendix E: Title VI Complaint Form**

**CENTRALINA’S TITLE VI COMPLAINT FORM**

**Section I:**

Any person who believes that he or she, as a member of a protected class, has been discriminated against, may file a written complaint with Centralina within 180 days after the discrimination occurred. Persons needing translation, accessible format or other assistance, may contact (704) 372-2416.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone 1: \_\_\_\_\_ Phone 2: \_\_\_\_\_

Email: \_\_\_\_\_

**Section II:**

Are you filing this complaint on your own behalf? (circle yes or no)		Yes*	No
Yes	*If you answered “yes” to this question, please proceed to Section III.		
No	If you answered “no”, please state the name of and relationship you have to the person for whom you are filing this complaint.		Name:
			Relationship:
	Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No

**Section III:**

I believe the alleged discrimination experienced was based on (circle all that apply):											
<b>Title VI</b>						<b>Other Non-Discrimination Statutes</b>					
Race	<input type="checkbox"/>	Color	<input type="checkbox"/>	National Origin	<input type="checkbox"/>	Gender	<input type="checkbox"/>	Age	<input type="checkbox"/>	Disability	<input type="checkbox"/>
						Religion	<input type="checkbox"/>	Sex	<input type="checkbox"/>	Income	<input type="checkbox"/>
						Political Affiliation	<input type="checkbox"/>	LEP	<input type="checkbox"/>	*Other	<input type="checkbox"/>
*If you selected “Other,” please explain:											
Date of Alleged Discrimination (Month/Day/Year):											

*Please explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name, title and contact information of the person(s) who you believe discriminated against you (if known). If more space is needed, please use a separate page and attach it to this form.*

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*Please provide the names, addresses and telephone numbers of persons (witnesses, fellow employees, supervisors or others) whom we may contact for additional information to support or clarify your complaint. Attach additional pages, if needed.*

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_



**Section IV:**

Have you filed this complaint with any other Federal, State or local agency, or with any Federal or State court?	Yes	No
Federal Agency: _____ State Agency: _____		
Federal Court: _____ State Court: _____		
Local Agency: _____		

**Section V:**

Have you <u>previously</u> filed a discrimination complaint with Centralina?	Yes	No
Have you discussed the complaint with any Centralina representative?	Yes*	No
If yes, please provide the name, position and date of discussion:		

***You may attach any written materials or other information that you think is relevant to your complaint.***

*By signing below, you acknowledge that the information in this complaint is true and accurate to the best of your knowledge and belief.*

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**MAIL OR DELIVER COMPLAINT FORM TO:**

Centralina Regional Council  
 ATTN: Equal Opportunity Officer  
 9815 David Taylor Drive, STE 100  
 Charlotte, NC 28262

**Appendix F: Title VI Complaint Log**

**CENTRALINA’S TITLE VI COMPLAINT LOG**

	<b>Date (Month, Day, Year)</b>	<b>Summary (include basis of complaint: race, color, or national origin)</b>	<b>Status</b>	<b>Action(s) Taken</b>
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

### **Appendix G: Maps for LEP and EJ Areas**

Centralina is charged with evaluating plans and programs for Environmental Justice (EJ) sensitivity and expanding outreach efforts to limited English proficient individuals, low-income, minority, and other potentially disadvantaged populations. Centralina collects relevant data from the U.S. Census Bureau. Using this data, Centralina is able to create a snapshot of the region, mapping the locations of identified EJ and limited English proficiency populations.

Centralina maintains data on populations such as the following, which is available for review by the public upon request:

- Percent of non-English speaking
- Percent of population in poverty
- Percent of African-American population
- Percent of Asian population
- Percent of population age 65+

