

Town of Cary (GoCary) TITLE VI PROGRAM



Ciudad de Cary (GoCary)
PROGRAMA DEL TÍTULO VI

TOWN OF CARY, NORTH CAROLINA



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Introduction

GoCary History

In 2001, the Town of Cary began its C-Tran Door to Door demand response transportation services town-wide for seniors and persons with disabilities. This service also included out of town trips for medical, educational, and employment trips for eligible customers. The service was so popular that in 2002 the Town expanded the service to the general public. The Town hired its first full-time transportation coordinator in July 2003 to handle all planning, administration, marketing, grants management and oversight of the transit contract and operations.

In 2005 the Town Council approved a public fixed route bus system comprised of five routes to augment the Door to Door services and provide the public transit service for the general public.

In 2007, C-Tran added the Maynard Loop counterclockwise route to provide service in both directions on Maynard Road, decorative passenger shelters were installed at high ridership locations, and additional Town staff was hired to aid in managing the system. Council approved an expanded fixed route service on Route 4 along High House Road extending it to NC Highway 55.

In February 2013, C-Tran reached the significant milestone of providing more than one million passenger trips on the fixed route service. C-Tran was rebranded in October 2016 to GoCary for fixed route service and GoCary Door to Door for demand response service, as part of a regional branding initiative.

In August of 2017, GoCary added expanded midday service on four routes with funding from the Wake Transit Plan, a countywide sales tax to fund transit improvements. GoCary also added Sunday service on both fixed-route and Door to Door at this time. Further expansions to the system, including a new route serving Weston Parkway are expected in 2020.

GoCary will continue to strive for improvement in the delivery of our public transit services through detailed analysis of efficiency, effectiveness, customer service, safety and customer feedback.

GoCary Title VI Program Objectives

Title VI activities are mandated by the federal government to ensure that people of all races, income levels, ages, and abilities have an equal voice in the planning and project delivery processes and receive equal benefit from the results of such planning. The Town of Cary is actively engaged in Title VI activities as a direct recipient of federal funding. The Town of Cary has developed a robust Title VI program, the goal of which is to ensure all people have a meaningful role in processes associated with the delivery of the Town's transit services.

All recipients are required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 forbids discrimination against anyone in the United States because of race, color, or national origin by any agency receiving Federal funds. The Federal-Aid Highway Act of 1973 added the requirement that there be no discrimination on the grounds of sex. Additionally, the Civil Rights Restoration Act of 1987 defined the word "program" to

make clear that discrimination is prohibited through an entire agency if any part of the agency receives Federal financial assistance.

Simply stated, The Town of Cary is to ensure that none of its activities or programs treats any part of the community any differently than another. Town of Cary expects every manager, contractor, and employee of federal-aid funds administered by the Town of Cary to be aware of and apply the intent of Title VI in performing assigned duties.

This Program outlines the requirements, roles, method of administration, and analysis that supports the Town's Title VI objectives. The Town of Cary operates under the premise that it is imperative that it develop transit services that are responsive to the needs and priorities of all Cary citizens. With an intentional focus, vulnerable populations are assured equal access to the Town's transit services. In order to facilitate a thorough understanding of associated activities, definitions are provided in Attachment A. The Title VI Program will be developed no less than every three years in accordance with federal regulation. The federal authorities governing the Town's non-discrimination obligations are outlined in the following section.

Non-Discrimination Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds 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 (implementation through 23 C.F.R. §200.9 and 49 C.F.R. § 21).

Section 162(a) of the Federal-Aid Highway Act of 1973 added the requirement that there be no discrimination on the grounds of sex.

Section 504 of the Rehabilitation Act of 1973 provides nondiscrimination under Federal grants and programs.

The Age Discrimination Act of 1975 prohibits discrimination in federally assisted Programs.

The Civil Rights Restoration Act of 1987, Public Law 100-209 provides clarification on the original intent of Congress in Title VI of the 1964 Civil Rights Act, Title IX of the Education Amendments of 1972, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973. The Civil Rights Restoration Act restores the broad, institution-wide scope and coverage of the non-discrimination statutes to include all programs and activities of federal-aid recipients, sub-recipients and contractors, whether such programs and activities are federally assisted or not.

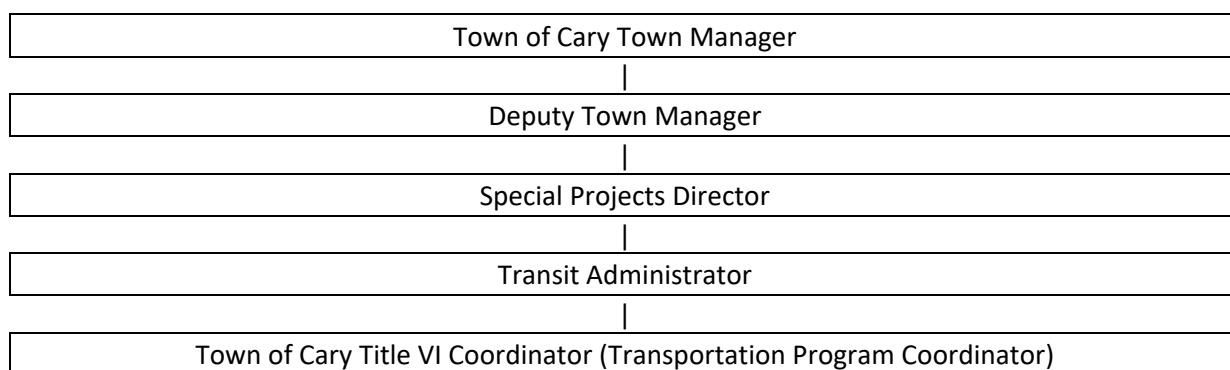
Executive Order 12898 (issued February 11, 1994) addresses Environmental Justice regarding minority and low-income populations.

Executive Order 13166 (issued August 16, 2000) improves access to services for persons with limited English proficiency.

Overview of Roles

Designation of Title VI Coordinator

The Title VI Coordinator is responsible for the overall Title VI Program implementation. This Title VI Coordinator is appointed by the Transit Administrator and reports directly to the Administrator on all Title VI issues. Staff in other Town program areas may assist the Title VI Coordinator with program implementation and resolution of Title VI issues. The Transit Administrator has appointed the Transportation Program Coordinator as the Title VI Coordinator. The Title VI Coordinator will also serve as the Limited English Proficiency Coordinator for the Town of Cary. The Assistant Transit Administrator assists the Transportation Program Coordinator in carrying out the Title VI and LEP responsibilities.



Title VI Coordinator Roles and Responsibilities

The Title VI Coordinator plays a lead role in the development and implementation of the Title VI Program. The Coordinator provides leadership and guidance to ensure nondiscrimination in Town of Cary programs, activities and services, and promotes the participation of all people regardless of race, color or national origin.

The Title VI Coordinator, through the provision of guidance and technical assistance on Title VI matters, has overall program responsibility for Title VI compliance including:

- Promptly processing and resolving Title VI complaints;
- Collecting statistical data (race, color and national origin) of participants in and beneficiaries of Town of Cary programs, activities, and services;
- Identifying and addressing discrimination when found to exist;
- Conducting fare and service equity analyses when necessary;
- Promptly resolving areas of deficiency in Title VI matters;
- Coordinating the development and implementation of Title VI and related statutes training programs;
- Developing Title VI information for public dissemination, where appropriate, in languages other than English;
- Monitoring Town of Cary LEP Plan and program activities for compliance with Title VI and related statutes.

Title VI Policy Statement

It is the policy of the Town of Cary to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibiting discrimination in Federally assisted programs require that no person in the United States of America shall, on the grounds of race, color, national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding Town of Cary's programs has a right to file a formal complaint with Town of Cary. Any such complaint must be in writing and submitted to the Town of Cary Title VI Coordinator within one hundred eighty (180) days following the date of the alleged occurrence.



MEMORANDUM

TO: All Town Transit Employees and Contract Employees

FROM: Brittany Goode, Transportation Program Coordinator/Title VI Coordinator

SUBJECT: Title VI Protection Against Discrimination

DATE: January 7, 2020

The Town of Cary's GoCary transit system is committed to providing essential services purposed toward enhancing the quality of life for Cary area residents and visitors. It is the policy of GoCary, in adherence to Title VI of the Civil Rights Act of 1964, to ensure that no person shall be excluded or denied benefits or access to services based on the grounds of race, color or national origin.

- No person shall be denied any service or benefit because of race, color or national origin
- Benefits or services shall not be charged or provided in a different manner based on race, color or national origin
- Facilities will not be located in any way that would limit or impede access to federally funded benefits or services

Further, Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* and the DOT Order 5610.2(a) require that we incorporate environmental justice and non-discrimination principles into transportation planning and decision-making processes as well as project specific environmental reviews. As is required by Environmental Justice, GoCary must:

- 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
- Ensure full and fair participation by all potentially affected communities in the transportation decision-making process
- Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations

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The Transportation Program Coordinator is responsible for compliance of all Title VI activities, including any reporting required by federal regulation. Any contracted projects will also include nondiscrimination language in all written agreements, to ensure adherence to all requirements that prohibit discrimination based on race, color or national origin.

Any person believing, they have been discriminated against based on race, color or national origin in receiving benefits or services must file a formal complaint. To be obtain a complaint form, go to www.gocary.org, contact GoCary by telephone at (919) 653-7141; or mail a request to: Town of Cary/GoCary; Attention: Title VI Coordinator; P.O. Box 8005; Cary, NC 27512.

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System-wide Service Standards and Policies

The following service standards and policies are meant to ensure that transit services and amenities are distributed equitably throughout the system. Service standards are regularly monitored by Town of Cary staff to ensure non-discrimination in the distribution of transit services and amenities.

Vehicle Load

Vehicle Load is the ratio of the number of passengers on a vehicle to the number of seats. GoCary operates multiple fixed-route vehicle types containing different capacities for both seated and standing riders. GoCary fixed-route services are not to exceed the manufacturer's recommended guidelines for vehicle load. During most trips, it is expected that all fixed-route passengers have a seat on the vehicle (a vehicle load maximum of 1.0). However, during peak periods of heavily utilized routes, standees are acceptable as long as the load does not exceed 150% of the seated capacity of the vehicle (a load maximum of 1.5).

The maximum vehicle load for Door to Door is 1.0 at all times. Due to the focus on disabled and senior ridership, every passenger is expected to have a seat available to them on Door to Door trips.

Vehicle Assignment

Vehicle assignment refers to the process by which transit vehicles are placed into revenue service throughout the transit system. This policy measures whether transit vehicles are equitably assigned considering the age of the vehicle, type of fuel used, and the number of seats in the vehicle. All buses are low-floor and equipped with climate control, ramps, Wi-Fi, and automated bus stop annunciators.

Vehicle assignments are often subject to change based on both the vehicles scheduled and incidental maintenance.

Vehicle assignments are routinely rotated throughout the system in order to achieve the greatest amount of equity between routes. However, there are some exceptions to this policy. The Maynard Loop routes (Route 1 and 2) is always assigned a smaller vehicle due both to low ridership and street width constraints along its route. Meanwhile, on weekends and holidays, GoCary operates Route 300 on behalf of GoTriangle. Since this service is regional in nature with connections to the greater regional network in Downtown Raleigh, a larger vehicle is always assigned to this route.

It is expected that upon implementation of the 2020 GoCary service changes, vehicles will be rotated through all local routes, while express routes (such as the proposed Cary Parkway pilot route, as well as proposed services to Apex or Holly Springs) will be served by smaller vehicles until demand for larger vehicles is apparent.

Vehicle Headway

Vehicle headway is defined as "the amount of time between two vehicles traveling the same direction on a given line or combination of lines." The Town strives to maintain thirty-minute headways on all local routes from start of service until after PM peak at 7 PM Monday through Saturday. At all other times, the Town strives to maintain sixty-minute headways, including evenings and Sundays.

For express routes, the Town strives to maintain sixty-minute headways during both AM and PM peak service Monday through Friday.

Service Type	Routes	Minimum Headway	Minimum Service Span	Minimum Service Week
Local Routes	1, 3, 4, 5, 6, 7	30 minutes weekdays and Saturday until 7 PM, 60 minutes weekdays after 7 PM and Sundays.	16 hours weekdays and Saturdays, 14 hours Sundays	Sunday to Saturday
Express Routes	Holly Springs/Apex	60 min.	3 hours AM, 3 hours PM	Monday to Friday

On-time Performance

The FTA defines on-time performance as “a measure of runs completed as scheduled.” The Town’s goal is to provide an average system-wide on-time performance of 85% for fixed route service. The Town defines on-time as departing from a designated bus stops within a -1/+5.5 minutes of the scheduled departure time. Buses should also not leave a designated bus stop before the scheduled time. Route(s) and trips not meeting the on-time performance goal will be analyzed for strategies to improve it.

The Town uses 93% as its on-time performance standard for Door to Door service.

On-time performance is monitored by the following methods:

- Fixed-routed: This is done by tracking actual bus departure times at designated time points using CAD/AVL bus technology and evaluating it against scheduled bus departure time at those time points. On-time performance reports are then produced and are assessible via TripSpark Streets Reports, a third-party online reporting platform.
- Door to Door: This is done by evaluating as a percentage the number of late trips (from Trapeze’s KPI reports) against the total number of trips (ADA and Senior trips only, excluding PCA and Companion trips) provided for each Tier of service.

Service Availability

Service availability is defined as “a general measure of the distribution of routes within a transit provider’s service area.” To the extent feasible, GoCary serves as major employers, medical offices, shopping areas, densely populated residential neighborhoods, and designated affordable/workforce housing, senior housing, and designated public housing, within the Town limits.

Bus stop spacing is related to ridership density. In dense commercial or mixed-use areas, stops may be spaced 700 to 1,000 feet apart, in lower density or residential areas stops may be spaced 1,000 to 1,500 feet apart.

Distribution of Transit Amenities

Transit amenities refer to items of comfort and convenience available to the general riding public. The Town of Cary has a standard drawing/detail for a comprehensive bus stop boarding pad with shelter.

The spring 2018 Bus Stop Inventory identified 216 GoCary bus stops throughout the service area. Of these stops, 204 are located within the Town of Cary jurisdiction. The remaining twelve stops fall within the jurisdiction of the City of Raleigh.

The current level of amenities and ADA compliance throughout the system is as follows:

Item	Number of stops	Percentage of Stops
Sidewalk Connectivity	196	90.7%
ADA-compliant boarding area	36	16.7%
Bench	25	11.6%
Trash receptacle	31	14.3%
Shelter (Town specifications)*	17	7.9%

*Does not include stops in shopping centers and other areas that are sheltered from elements with architectural features such as building overhangs and other structures that are not shelters built to Town of Cary specifications.

Amenities are distributed based on a Bus Stop Improvement Plan created in July 2018. The Bus Stop Improvement Plan includes the following priority order for amenity distribution:

- 1) All fixed-route bus stops throughout the GoCary system should first be enhanced to comply with ADA requirements with a minimum eight (8) feet long by five (5) feet wide concrete pad located between a sidewalk (if one exists) and the curb or edge of pavement of the street served by fixed-route transit. If less than five (5) feet exists between a street curb or edge of pavement and an existing sidewalk, the width of the pad may be reduced to less than five (5) feet as long as there is a minimum of five (5) feet of width for the free movement of mobility assistance devices (e.g., wheelchair). If greater than five (5) feet exists between a street curb or edge of pavement and an existing sidewalk, the width of the pad should be increased to greater than five (5) feet to ensure there is a flat continuous surface between a sidewalk and the street. If no sidewalk exists at the location of the bus stop, a minimum eight (8) feet long by five (5) feet wide concrete pad shall be installed adjacent to the curb or street edge, and a five (5)-foot wide sidewalk shall be constructed to the nearest intersection, existing sidewalk, or destination entrance (if permitted). These improvements should be prioritized to the stated condition using the following criteria and associated weights indicating their relative importance:

Criterion	Weight
Documented Bus Stop-Specific Request or Complaint	50%
Average Daily Boardings and Alightings (combined) at Stop	25%
Ease of Construction**	15%
Shared with Other Transit Providers	10%

*Boardings and alightings detected by ride check data or farebox or automatic passenger counter (APC) technology over the past six (6) months at each unimproved stop

**Rating assigned during spring 2018 bus stop inventory

- 2) Fixed-route bus stops throughout the GoCary system with greater than twenty (20) boardings per day should be improved with benches in accordance with Town-adopted bus stop improvement standard specifications. Bus stops improved with benches will also require trash receptacles (pole-

mounted) and bike racks. Where there is insufficient street lighting, solar lighting should also be provided at bench-only bus stops.

- 3) Fixed-route bus stops throughout the GoCary system with greater than ten (10) boardings per day should be improved with benches in accordance with Town-adopted bus stop improvement specifications. Bus stops improved with benches will also require trash receptacles (pole-mounted) and bike racks. Where there is insufficient street lighting, solar lighting should also be provided at bench-only bus stops.
- 4) Fixed-route bus stops throughout the GoCary system with greater than twenty (20) boardings per day should be improved with shelters in accordance with Town-adopted bus stop improvement specifications. Bus stops improved with shelters will also require trash receptacles, bike racks, and solar lighting. Pre-existing pole-mounted trash receptacles should be replaced with stand-alone trash receptacles.

The *Town Land Development Ordinance 7.10.6 Standards for Public Transit Access and Infrastructure* applies to all development plans and reuse/redevelopment plans for sites with frontage along corridors identified in the Comprehensive Transportation Plan, Cary Community Plan, or Wake Transit Plan for current or planned transit service and requires the installation of at least one (1) transit access location meeting the requirements in the Town's Standard Specifications and Details Manual.

Although the LDO and Standards Specifications and Details Manual has been developed as a set of general guidelines for the planning and design of the system, deviations from these criteria may be required in specific instances based on site characteristics or other requests. Typically, new development is compliant with the LDO and this policy.

Facility Site Equity Analysis

The Title VI Circular states the following regarding the siting of facilities:

In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color or national origin...

... Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

Since the submittal of the previous Title VI Program, GoCary has not planned, designed or built any facilities which would meet the definition of "facility" in the context of a potential facility siting equity analysis.

Methods of Administration

It is equally important how the Town will carry out the administration of the Title VI Program to meet the Town's objectives in regard to non-discrimination. Complaint procedures, recordkeeping, data

collection and public outreach and participation are interconnected methods in order to fulfill the implementation of the Program.

Title VI Complaint Procedures

Any person who believes he or she has been denied benefits or excluded from participation in services of any program or activity administered by USDOT or its sub-recipients, consultants, or contractors on the basis of race, color, national origin (including LEP) may file a complaint pursuant to Title VI and/or related statutes. All Title VI complaints are considered formal. Complainants must file a signed, written complaint no later than 180 days from:

- The date of the alleged act of discrimination;
- 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 the conduct was discontinued.

The complaint should include the following information:

- The complainant's name, mailing address, and contact information (*i.e.*, telephone number, email address, etc.)
- How, when, where, and why the complainant believes he or she was discriminated against. Include the location, names, and contact information of any witnesses.
- Any additional information the complainant deems significant and pertinent to the grievance(s).

The GoCary Civil Rights Complaint Form may be used to submit the complaint information. Complaint forms can also be obtained by contacting the GoCary Title VI Coordinator at 919-653-7141, or by visiting the GoCary website at www.GoCary.org. The complaint may be filed in writing with Town of Cary at the following address:

Town of Cary/GoCary
Title VI Coordinator
P.O. Box 8005
Cary, NC 27512

In addition to filing Title VI complaints with Town of Cary Transit Division, complainants may also file a Title VI complaint with the following agency:

U.S. Department of Transportation
Attn: Title VI Program Manager
1200 New Jersey Avenue SE
Washington, DC 20590

Title VI complaints received by the Town of Cary are investigated by the Town of Cary's Title VI Coordinator. Once a complaint is received, it will be reviewed by the Title VI Coordinator to determine if the Town has jurisdiction. The complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by the Town.

The Title VI Coordinator will begin an investigation within fifteen (15) working days of receipt of a complaint. The Title VI Coordinator will assign an internal tracking number on the complaint form.

The Title VI Coordinator will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if needed, to investigate the complaint. Failure of the complainant to provide the requested information in a timely basis (within 10 days unless the Title VI Coordinator provides a different timeline) may result in the administrative closure of the complaint or a delay in complaint resolution. A case may also be administratively closed if the complainant no longer wishes to pursue their case.

Reasonable measures will be taken to preserve any information that is confidential. At a minimum, the Title VI Coordinator will:

- Identify and review all relevant documents, practices and procedures;
- Identify and interview persons with knowledge of the Title VI violation, e.g. the person making the complaint, witnesses or anyone identified by the complainant, anyone who may have been subject to similar activity or anyone with relevant information.

The investigation will be completed within ninety (90) days of receipt of the complaint. Upon completion of the investigation, the Title VI Coordinator will complete a final written report for the Transit Administrator. The report shall include a background summary of the complaint, findings of the investigation and a conclusion. If a Title VI violation is found to exist, corrective actions and remedial steps as appropriate and necessary will be included in the report and taken immediately. A closing letter summarizing the results of the investigation, stating the findings and advising of any corrective action to be taken as a result of the investigation will be provided to the complainant.

If the matter cannot be resolved, then the complainant will be informed of his/her right to appeal to the U.S. Department of Transportation Office of Civil Rights at the following address:

U.S. Department of Transportation
Attn: Title VI Program Manager
1200 New Jersey Avenue SE
Washington, DC 20590

NOTICE:

Complainants are encouraged to send all written correspondence through the U.S. Postal Service via certified mail in order to ensure that documents are easily tracked. If complainants choose to submit complaints by facsimile and/or email, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

Recordkeeping

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, copies of Title VI complaints or lawsuits and related documentation, correspondence to and from complainants, and Title VI investigations.

Data Collection

Statistical data on race, color, national origin of participants in and beneficiaries of Town of Cary programs (e.g., affected populations and participants), will be gathered and analyzed by the Town of Cary to determine the transportation investment benefits and burdens to the eligible population, including minority and low-income populations as necessary. Data gathering procedures will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI Program administration. The Town of Cary will work closely with the Capital Area Metropolitan Planning Organization (CAMPO), the region's designated MPO, in collecting and analyzing regional demographic data to assess impacts of regional transportation investments.

Additionally, transit service and amenity data is regularly collected and monitored in order to ensure that transit service is provided in a non-discriminatory manner.

Public Dissemination of Title VI Information

Recipients of federal financial assistance are required to publish or advertise that the program is an equal opportunity program and/or indicate that Federal law prohibits discrimination.

The Town of Cary disseminates Title VI information to the public through posted notices in English and Spanish on all vehicles, at the Cary Depot (transit center), and at the front office of the contractor's facility. Additionally, the Town of Cary posts Title VI information, complaint procedures and a complaint form on the Town website. Title VI notification is also provided on the fixed route system map and in the Door to Door brochure.

Public Participation Plan

The transit public participation and outreach process is conducted by the Town of Cary for various transit related activities and actions. The Town of Cary may conduct public outreach activities related to capital projects, service changes, fare changes, federal requirements and other transit-related events. Additionally, the CAMPO Transportation Improvement Program (TIP) process is used to satisfy the public participation process of the Program of Projects (POP) that is required in U.S.C. Section 5307. Information regarding CAMPO and the adopted TIP is available at: <http://www.campo-nc.us>.

A Title VI Public Participation Plan was established to ensure adequate inclusion of the public throughout the Town of Cary in accord with the content and considerations of Title VI of the Civil Rights Act of 1964. The full Public Participation Plan can be found in Appendix F. Federal regulations state that recipients of federal funding must "promote full and fair participation in public transportation decision-making without regard to race, color or national origin." The Town of Cary uses the Title VI Public Participation Plan, as well as the CAMPO Public Participation Plan, to ensure adequate involvement of low-income, minority and limited English proficient (LEP) populations, following guidance from the Title VI Requirements and Guidelines for Federal Transit Administration Recipients Circular.

Involving the general public in Town of Cary practices and decision-making processes provides helpful information to improve the transit system and better meet the needs of the community. Although public participation methods and extent may vary with the type of plan, program and/or service under consideration as well as the resources available, a concerted effort to involve all affected parties will be conducted in compliance with this Program. To include effective strategies for engaging low-income, minority and LEP populations, the Circular suggests that the following may be considered:

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
- Employing different meeting sizes and formats.
- Coordinating with community- and faith-based organizations, educational institutions and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

The Town of Cary currently practices all of these strategies in different situations, in compliance with Federal regulations, so that minority, low-income and LEP populations are informed and also have meaningful opportunities to engage in planning activities and provide input as part of the decision-making process.

Minority Representation on Planning and Advisory Bodies

The Title VI Circular states the following regarding the membership of planning and advisory bodies:

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.

GoCary works with a number of local jurisdictions, boards, and communities to carry out its business and planning efforts. Under its council-manager form of administration, the citizens of Cary elect a seven-member Town Council, including the mayor. Four of the seven Council members are district representatives chosen by voters within each geographic district. Two council members and the mayor are at-large representatives elected Town-wide. Cary elections are held in odd-numbered years. The council members' four-year terms are staggered so that voters fill three or four of the seats every two years.

The elected Town Council creates a vision for the community by setting the policies, goals, and direction of the government including adopting necessary laws.

Encouraging Minority Participation

Town Council candidates do not run as members of political parties, so there are no primaries. The Town of Cary utilizes the Election and Runoff Method of Election. In October of odd-numbered years, Cary-registered voters cast their votes. If there is no clear majority winner (50 percent of those casting ballots, plus one) for a particular seat, then the candidate receiving the second highest number of votes may call for a runoff election. A runoff election, if needed, is conducted in November.

Town elections are held in odd-numbered years. The mayor and all Council members serve four-year terms.

The mayor, District B, District D, and one at-large seat are elected in the cycle that includes 2015, 2019, 2023 and so on.

District A, District C, and one at-large seat are elected in the cycle that includes 2017, 2021, 2025, and so on.

A full list of current Council members and their terms is available from the [Wake County Board of Elections website](#).

Subrecipient Monitoring

The Title VI Circular provides the following guidance regarding subrecipient monitoring:

Subrecipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts. Such programs may be submitted and stored electronically at the option of the primary recipient. Subrecipients may choose to adopt the primary recipient's notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate.

Currently, GoCary does not have any subrecipients.

Conclusion

The goal of this program is to document and enhance opportunities for Title VI populations to have a meaningful voice, to receive equal benefits from the Town of Cary's GoCary program and activities without shouldering a disproportionate share of burdens. The program itself is considered a work in progress that will evolve as people's needs and participation in the process change. For more information, please contact the Title VI Coordinator at (919) 653-7141.

Appendix A - Definitions

Adverse Effect – the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to: bodily impairment, infirmity, illness, or death; air, noise, and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or non-profit organizations; increased traffic congestion, isolation, exclusion or separation of individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of benefits of Department of Transportation (DOT) programs, policies, or activities.

Affirmative Action – a good faith effort to eliminate past and present discrimination in all federally-assisted programs, and to ensure future nondiscriminatory practices.

Beneficiary – any person or group of persons (other than States) entitled to receive benefits directly or indirectly, from any federally assisted program, *i.e.*, relocates, impacted citizens, communities, etc.

Census Unit of Analysis – Analyses are conducted at the smallest and most recently available Census unit for which data is readily available for determining both minority and low-income status.

Compliance – the satisfactory condition existing when a recipient has effectively implemented all of the Title VI requirements or can demonstrate that every good faith effort toward achieving this end has been made.

Discrimination – any act or inaction, whether intentional or unintentional, through which a person in the United States, solely because of race, color, religion, sex, or national origin, has been otherwise subjected to unequal treatment under any program or activity of a Federal aid recipient, subrecipient, or contractor.

Disparate Impact – racially neutral policies or practices that have the effect of disproportionately excluding or adversely affecting members of a group protected under Title VI, and the recipient's policy or practice lacks a substantial legitimate justification.

Disparate Treatment – actions that result in circumstances where similarly situated persons are treated differently (*i.e.*, - less favorably) than others because of their race, color, or national origin.

Disproportionate High and Adverse Effect on Minority and Low-income Populations – an adverse effect that:

- (1) Is predominately borne by a minority population and/or a low-income population; or
- (2) Will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

Environmental Justice Activity – an action taken by DOT, FTA, or a recipient or subrecipient of FTA funding to identify and address adverse and disproportionate effects of its policies, programs, or activities on

minority and/or low-income populations consistent with Executive Order 12898 and the DOT Order 5610.2 on Environmental Justice.

Federal Financial Assistance –

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

Geographic Extent of Analysis – The geographic extent of analyses is limited to a ¼ mile buffer around existing and proposed project areas (*i.e.*, – routes). ¼ mile areas are generally accepted as a standard walk distance for transit riders.

Limited English Proficient (LEP) Persons – are persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. LEP includes people who reported to the U.S. Census that they do not speak English well or do not speak English at all.

Low-Income Persons – are persons whose median household income is at or below the Department of Health and Human Services' poverty guidelines.

Low-Income Population – any readily identifiable groups of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity. (Low-income populations are made up of persons whose median household is at or below the Department of Health and Human Services' poverty guidelines. Using 2008-2012 American Community Service Estimates, the average low-income percentage within the Town of Cary area is 5.7%. During Environmental Justice assessments, Town of Cary considers Census blocks with low-income populations greater than 5.7% as predominately minority areas.)

Minority Persons – are the following:

- (1) American Indians and Alaska Natives, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- (2) Asians, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.
- (3) Blacks or African American Populations, which refers to peoples having origins in any of the Black racial groups of Africa.
- (4) Hispanic or Latino Populations, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

- (5) Native Hawaiians and Other Pacific Islanders, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Minority Population – any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity. (According to Town of Cary’s Title VI policy, the Town defines minority populations as non-white persons and those of Hispanic origin, mirroring the FTA definition. Such individuals include persons of American Indian, Alaska Native, Black or African American, and Native Hawaiian or other Pacific Islander origin. Using 2010 Census data, the average minority population (non-white) within the Town of Cary area is 31.1%. During EJ assessments, the Town of Cary considers Census blocks with minority populations greater than 31.1% as predominately minority areas.)

National Origin – the particular nation in which a person was born, or where the person’s parents or ancestors were born.

Noncompliance – a FTA determination that the recipient or subrecipient has engaged in activities that have had the purpose or effect of denying persons the benefits of, excluding participation in, or subjecting persons to discrimination in a recipient’s program or activity.

Recipient – any State, political subdivision, instrumentality, or any public or private agency, institution, department or other organizational unit receiving financial assistance from FTA.

Persons with Disabilities – an individual with a disability is a person, who has a physical or mental impairment, which substantially limits one or more major life activities. For transportation services, a person with a disability is an individual, who by reason of illness, incapacity or disability, is unable, without special facilities or special planning or design, to utilize mass transportation facilities and services as effectively as person who are not so affected.

Predominantly Minority Area – a geographic area, such as a neighborhood, Census tract, or traffic analysis zone where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient’s service area.

Predominantly Low-income Area – a geographic area, such as a neighborhood, Census tract, or traffic analysis zone where the proportion of low-income persons residing in that area exceeds the average proportion of low-income persons in the recipient’s service area.

Public Participation – an open process in which the rights of the community to be informed, to provide comments to the government and to receive a response from the government are met through a full opportunity to be involved and express needs and goals.

Program – includes any program, project, or activity for the provision of services, financial aid, or other benefits to individuals (including education or training, health, welfare, rehabilitation, housing, or other services, whether provided through employees of the recipient of federal financial assistance or provided by others through contracts or other arrangements with the recipient, and including work opportunities), or for the provision of facilities for furnishing services, financial aid or other benefits to individuals. The services, financial aid, or other benefits provided under a program receiving Federal financial assistance

shall be deemed to include any services, financial aid, or other benefits provided with the aid of Federal financial assistance or with the aid of any non-Federal funds, property, or other resources required to be expended or made available for the program to meet matching requirements or other conditions which must be met in order to receive the Federal financial assistance, and to include any services, financial aid or other benefits provided in or through a facility provided with the aid of Federal financial assistance or such non-Federal resources.

Public Participation – an open process in which the rights of the community to be informed, to provide comments to the Government and to receive a response from the Government are met through full opportunity to be involved and express needs and goals.

Secretary – the Secretary of the U.S. Department of Transportation.

Service Area – either the geographic area in which a transit agency is authorized by its charter to provide service to the public or to the planning area of a State Department of Transportation or Metropolitan Planning Organization.

Service Frequency – the frequency of service is a general indication of the same level of service provided along a route and a component of the amount of travel time expended by a passenger to reach his/her destination.

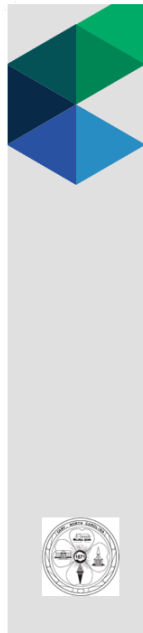
Service Standard/Policy – an established policy or service performance measure used by a transit provider or other recipient, or subrecipient as a means to plan or distribute services and benefits within its service area.

Title VI Program – a recipient's submission, provided to FTA or to the subrecipient's direct recipient every three years, containing information in response to the requirements of this circular.

Vehicle Headway – is the time interval between two vehicles traveling in the same direction.

Vehicle Load – can be expressed as the ratio of passengers per vehicle or the ratio of passengers to the number of seats on a vehicle during a vehicle's maximum load point.

Appendix B – Notice to the Public



Town of Cary/GoCary CIVIL RIGHTS NOTICE TO THE PUBLIC

The Town of Cary, GoCary (GoCary) is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its service on the basis of race, color or national origin as provided under Title VI of the Civil Rights Act. In addition to Title VI, GoCary also prohibits discrimination based on sex, age, disability, religion, sexual orientation, gender identity, and other protected classes enumerated in federal and state laws. Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding GoCary's programs has a right to file a formal complaint with the Town of Cary's Title VI Coordinator within one hundred eighty (180) days following the date of the alleged occurrence. Any such complaint must be in writing to YourRideMatters@townofcary.org or to the following address:

GoCary Title VI Coordinator
PO Box 8005
Cary, NC 27512
(919) 653-7141

Additional information regarding protections under Title VI and detailed instructions for submitting a formal Title VI complaint are available on the GoCary website at www.GoCary.org. A complaint may also be filed directly with the Federal Transit Administration by submitting it to:

U.S. Department of Transportation
Attn: Title VI Program Manager
1200 New Jersey Avenue SE
Washington, DC 20590

If you need an interpreter or if your hearing or speech is impaired:

We provide free interpreter services by phone or in the transit office. Call us at (919) 481-2020, extension 3 and state the language you speak. If your business cannot be completed by phone, we will make an appointment for you at the transit office and arrange for an interpreter via telephone or in person at the time of your visit.

If your hearing or speech is impaired and you use TTY (teletypewriter services), then you may call 711 or (800) 735-2962 and request connection to the GoCary information line, (919) 481-2020.



Town of Cary/GoCary AVISO DE DERECHOS CIVILES AL PÚBLICO

La Ciudad de Cary, GoCary (GoCary) se compromete a garantizar que ninguna persona sea excluida de la participación o se le nieguen los beneficios de su servicio sobre la base de la raza, el color o el origen nacional según lo dispuesto en el Título VI de la Ley de Derechos Civiles. Además del Título VI, GoCary también prohíbe la discriminación basada en el sexo, la edad, la discapacidad, la religión, la orientación sexual, la identidad de género y otras clases protegidas enumeradas en las leyes federales y estatales. Cualquier persona que crea que ha sido agaviada por una práctica discriminatoria ilegal con respecto a los programas de GoCary tiene derecho a presentar una queja formal ante el Coordinador del Título VI de la Ciudad de Cary dentro de los ciento ochenta (180) días siguientes a la fecha de la supuesta ocurrencia. Dicha queja debe ser por escrito a YourRideMatters@townofcary.org o a la siguiente dirección:

Coordinador del Título VI de GoCary
PO Box 8005
Cary, NC 27512
(919) 653-7141

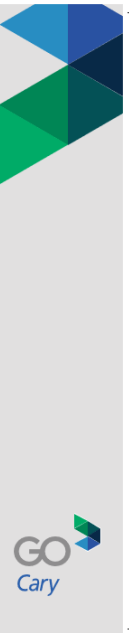
En el sitio web de GoCary en www.gocary.org encontrará información adicional sobre las protecciones bajo el Título VI e instrucciones detalladas para presentar una queja formal del Título VI. También se puede presentar una queja directamente ante la Administración Federal de Tránsito presentándola a:

El Departamento de Transporte de EE
Atención: Director del programa Título VI
1200 New Jersey Avenue SE
Washington, DC 20590

Si usted necesita un/a intérprete o si usted tiene impedimento para oír/escuchar o hablar:

Brindamos servicios de interpretación gratuitos por teléfono o en la oficina de tránsito. Llámenos al (919) 481-2020, extensión 3 e indique el idioma que habla. Si su negocio no puede completarse por teléfono, haremos una cita para usted en la oficina de tránsito y haremos los arreglos para un intérprete por teléfono o en persona en el momento de su visita.

Si tiene problemas para oír o hablar y usa TTY (servicios de teletipo), puede llamar al 711 o al (800) 735-2962 y solicitar la conexión a la línea de información de GoCary, (919) 481-2020.



Title VI Public Notices are posted on the Town of Cary website, the GoCary system map and Door to Door brochure, all fixed route and door to door vehicles, at the Cary Depot (transit center), and in the MV Transportation lobby.



Town of Cary/GoCary CIVIL RIGHTS NOTICE TO THE PUBLIC

The Town of Cary, GoCary (GoCary) is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its service on the basis of race, color or national origin as provided under Title VI of the Civil Rights Act. In addition to Title VI, GoCary also prohibits discrimination based on sex, age, disability, religion, sexual orientation, gender identity, and other protected classes enumerated in federal and state laws. Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding GoCary's programs has a right to file a formal complaint with the Town of Cary's Title VI Coordinator within one hundred eighty (180) days following the date of the alleged occurrence. Any such complaint must be in writing to YourRideMatters@townofcary.org or to the following address:

GoCary Title VI Coordinator
PO Box 8005
Cary, NC 27512
(919) 653-7141

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If your hearing or speech is impaired and you use TTY (teletypewriter services), then you may call 711 or (800) 735-2962 and request connection to the GoCary information line, (919) 481-2020.



Town of Cary/GoCary

AVISO DE DERECHOS CIVILES AL PÚBLICO

La Ciudad de Cary, GoCary (GoCary) se compromete a garantizar que ninguna persona sea excluida de la participación o se le nieguen los beneficios de su servicio sobre la base de la raza, el color o el origen nacional según lo dispuesto en el Título VI de la Ley de Derechos Civiles. Además del Título VI, GoCary también prohíbe la discriminación basada en el sexo, la edad, la discapacidad, la religión, la orientación sexual, la identidad de género y otras clases protegidas enumeradas en las leyes federales y estatales. Cualquier persona que crea que ha sido agraviada por una práctica discriminatoria ilegal con respecto a los programas de GoCary tiene derecho a presentar una queja formal ante el Coordinador del Título VI de la Ciudad de Cary dentro de los ciento ochenta (180) días siguientes a la fecha de la supuesta ocurrencia. Dicha queja debe ser por escrito a YourRideMatters@townofcary.org o a la siguiente dirección:

Coordinador del Título VI de GoCary
PO Box 8005
Cary, NC 27512
(919) 653-7141

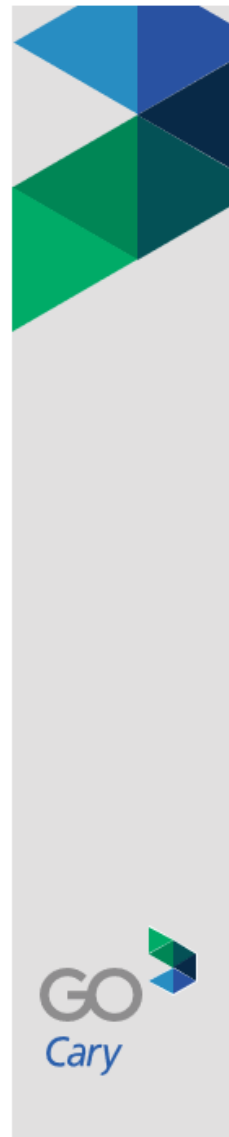
En el sitio web de GoCary en www.gocary.org encontrará información adicional sobre las protecciones bajo el Título VI e instrucciones detalladas para presentar una queja formal del Título VI. También se puede presentar una queja directamente ante la Administración Federal de Tránsito presentándola a:

El Departamento de Transporte de EE
Atención: Director del programa Título VI
1200 New Jersey Avenue SE
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Si usted necesita un/a intérprete o si usted tiene impedimento para oír/escuchar o hablar:

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Si tiene problemas para oír o hablar y usa TTY (servicios de teletipo), puede llamar al 711 o al (800) 735-2962 y solicitar la conexión a la línea de información de GoCary, (919) 481-2020.



Appendix C – Title VI Complaint Procedures

Any person who believes he or she has been denied benefits or excluded from participation in services of any program or activity administered by USDOT or its sub-recipients, consultants, or contractors on the basis of race, color, national origin (including LEP) may file a complaint pursuant to Title VI and/or related statutes. All Title VI complaints are considered formal. Complainants must file a signed, written complaint no later than 180 days from:

- The date of the alleged act of discrimination;
- 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 the conduct was discontinued.

The complaint should include the following information:

- The complainant's name, mailing address, and contact information (*i.e.*, telephone number, email address, etc.)
- How, when, where, and why the complainant believes he or she was discriminated against. Include the location, names, and contact information of any witnesses.
- Any additional information the complainant deems significant and pertinent to the grievance(s).

The GoCary Civil Rights Complaint Form may be used to submit the complaint information. Complaint forms can also be obtained by contacting the GoCary Title VI Coordinator at 919-653-7141, or by visiting the GoCary website at www.GoCary.org. The complaint may be filed in writing with Town of Cary at the following address:

Town of Cary/GoCary
Title VI Coordinator
P.O. Box 8005
Cary, NC 27512

In addition to filing Title VI complaints with Town of Cary Transit Division, complainants may also file a Title VI complaint with the following agency:

U.S. Department of Transportation
Attn: Title VI Program Manager
1200 New Jersey Avenue SE
Washington, DC 20590

Title VI complaints received by the Town of Cary are investigated by the Town of Cary's Title VI Coordinator. Once a complaint is received, it will be reviewed by the Title VI Coordinator to determine if the Town has jurisdiction. The complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by the Town.

The Title VI Coordinator will begin an investigation within fifteen (15) working days of receipt of a complaint. The Title VI Coordinator will assign an internal tracking number on the complaint form.

The Title VI Coordinator will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if needed, to investigate the complaint. Failure of the complainant to provide the requested information in a timely basis (within 10 days unless the Title VI Coordinator provides a different timeline) may result in the administrative closure of the complaint or a delay in complaint resolution. A case may also be administratively closed if the complainant no longer wishes to pursue their case.

Reasonable measures will be taken to preserve any information that is confidential. At a minimum, the Title VI Coordinator will:

- Identify and review all relevant documents, practices and procedures;
- Identify and interview persons with knowledge of the Title VI violation, e.g. the person making the complaint, witnesses or anyone identified by the complainant, anyone who may have been subject to similar activity or anyone with relevant information.

The investigation will be completed within ninety (90) days of receipt of the complaint. Upon completion of the investigation, the Title VI Coordinator will complete a final written report for the Transit Administrator. The report shall include a background summary of the complaint, findings of the investigation and a conclusion. If a Title VI violation is found to exist, corrective actions and remedial steps as appropriate and necessary will be included in the report and taken immediately. A closing letter summarizing the results of the investigation, stating the findings and advising of any corrective action to be taken as a result of the investigation will be provided to the complainant.

If the matter cannot be resolved, then the complainant will be informed of his/her right to appeal to the U.S. Department of Transportation Office of Civil Rights at the following address:

U.S. Department of Transportation
Attn: Title VI Program Manager
1200 New Jersey Avenue SE
Washington, DC 20590

NOTICE:

Complainants are encouraged to send all written correspondence through the U.S. Postal Service via certified mail in order to ensure that documents are easily tracked. If complainants choose to submit complaints by facsimile and/or email, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

Appendix D – Title VI Complaint Form



Civil Rights Complaint Form

Title VI of the 1964 Civil Rights Act and related nondiscrimination statutes and regulations require 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. In addition to Title VI, GoCary also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status, or sexual orientation. The following information is necessary to assist us in processing your complaint. Should you require assistance in completing this form, please let us know.

Instructions: To submit a Civil Rights complaint to GoCary, please print and complete the following form, sign and return to: GoCary, Attention: Transportation Program Coordinator, PO Box 8005, Cary, NC 27512. For questions or a full copy of GoCary's Civil Rights policies and complaint procedures, please submit a written request to the above address, visit www.gocary.org, call (919) 853-7141, or Email YourRideMatters@townofcary.org.

Section I:	
1. Name (Complainant):	
2. Home Address (Street No., City, State, Zip)	
3. Phone:	4. Email Address:
5. Accessible format requirements? (please check preference)	
<input type="checkbox"/> Large Print <input type="checkbox"/> Audio Tape <input type="checkbox"/> TDD	
<input type="checkbox"/> Other (please indicate) _____	
Section II:	
6. Are you filing this complaint on your own behalf? <input type="checkbox"/> Yes <input type="checkbox"/> No (If you answered "yes" to this question, please go to Section III .)	
7. If you answered "no" to question 6, please describe your relationship to the person (Complainant) for whom you are filing and why you are filing for a third party:	
8. Have you obtained permission of the aggrieved party (Complainant) to file this complaint on his or her behalf? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Section III:	
9. Have you previously filed a Civil Rights complaint with GoCary? <input type="checkbox"/> Yes <input type="checkbox"/> No	
10. Have you filed this complaint with any other federal, state, or local agencies or with any federal or state court? <input type="checkbox"/> Yes <input type="checkbox"/> No	
11. If "yes," please check all that apply:	
<input type="checkbox"/> Federal Agency <input type="checkbox"/> Federal Court <input type="checkbox"/> State Agency <input type="checkbox"/> State Court <input type="checkbox"/> Local Agency	



12. If filed at an agency and/or court, please provide information for your point of contact at the agency/court where the complaint was filed:

Agency/Court: Contact Name: Address: Phone Number:

Section IV:

13. Date of Incident:	14. If applicable, name of person(s) who allegedly discriminated against you:
-----------------------	---

15. Discrimination based on (please check all that apply):

a. <input type="checkbox"/> Race	b. <input type="checkbox"/> Color	c. <input type="checkbox"/> National Origin	d. <input type="checkbox"/> Age	e. <input type="checkbox"/> Sex
f. <input type="checkbox"/> Disability	g. <input type="checkbox"/> Religion	h. <input type="checkbox"/> Medical Condition	i. <input type="checkbox"/> Marital Status	
j. <input type="checkbox"/> Sexual Orientation	k. <input type="checkbox"/> Other _____			

16. Please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint. You may attach additional sheets as necessary.

17. How can this issue be resolved to your satisfaction?	
18. Please list any person(s) we may contact for additional information to support or clarify your complaint: Name: _____ Address: _____ Phone Number: _____ 	
Section V:	
Signature: _____	Date of filing: _____
<u>Please note: GoCary cannot accept your complaint without a signature.</u>	
Please mail your completed form to:	
GoCary Attention: Transportation Program Coordinator PO Box 8005 Cary, NC 27512	
Title VI complaints may also be filed with:	
The U.S. Department of Transportation Attn: Title VI Program Manager 1200 New Jersey Avenue SE Washington, DC 20590	



Formulario de queja de Título VI de derechos civiles

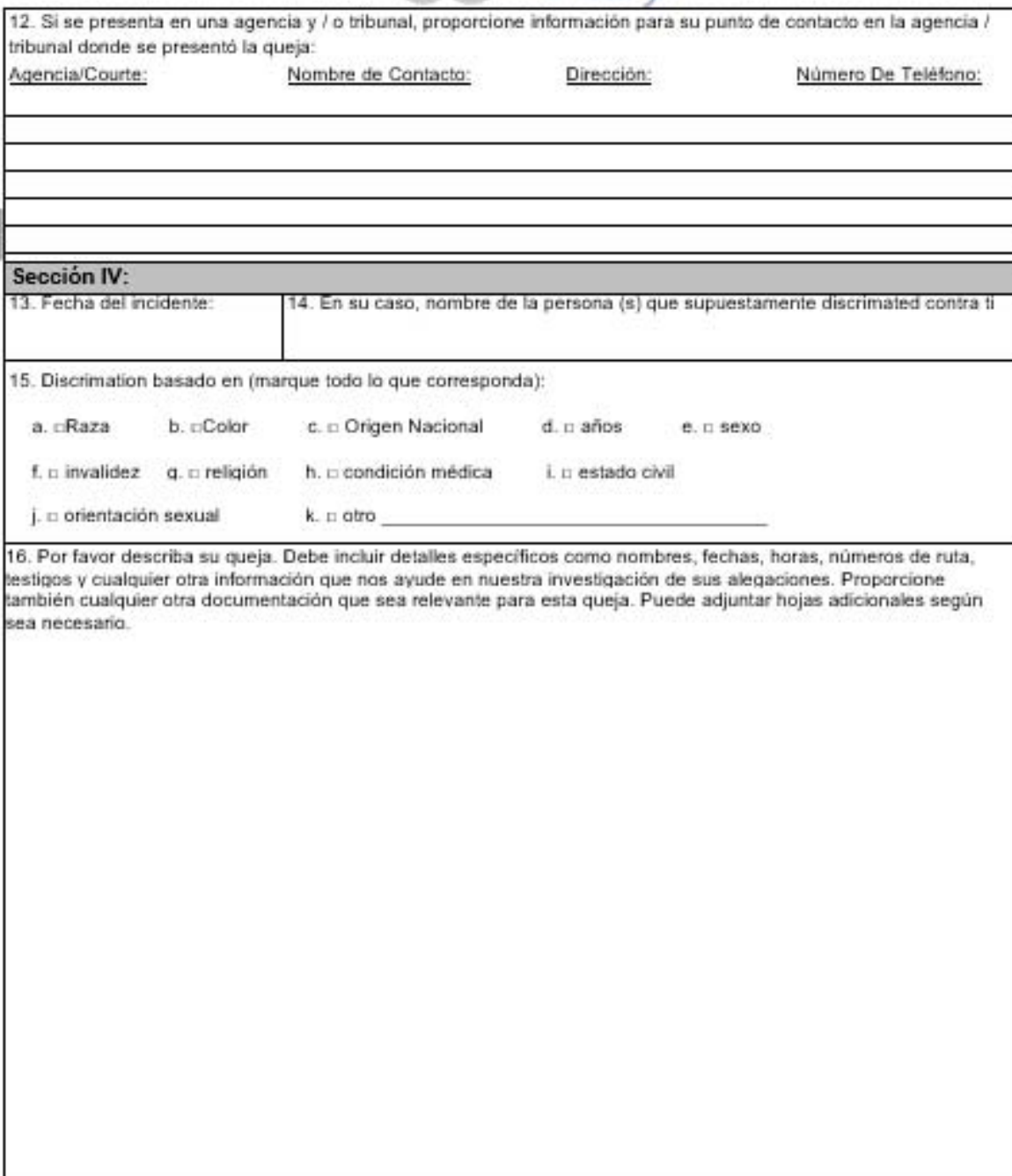
El Título VI de la Ley de Derechos Civiles de 1964 y los estatutos y reglamentos relacionados con la no discriminación requieren que ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional sea excluida de la participación, se le nieguen los beneficios o se someta a discriminación bajo cualquier programa o actividad que recibe asistencia financiera federal. Además del Título VI, GoCary también prohíbe la discriminación por sexo, edad, discapacidad, religión, afección médica, estado civil u orientación sexual. La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, infórmenos.

Instrucciones: Para enviar una queja de Título VI a GoCary, imprima y complete el siguiente formulario, firme y devuelva a: GoCary, Atención: Coordinador de Título VI, PO Box 8005, Cary, NC 27512. Para preguntas o una copia completa del Política de GoCary Título VI y procedimientos de queja, envíe una solicitud por escrito a la dirección anterior, visite www.gocary.org, llame al (919) 653-7141 o envíe un correo electrónico a YourRideMatters@townofcary.org.

Sección I:	
1. Nombre (Querellante):	
2. Domicilio (Calle No., ciudad, estado, código postal) Teléfono:	
3. Teléfono:	4. Dirección De Correo Electrónico:
5. Requisitos de formato accesible? (por favor marque preferencia)	
<input type="checkbox"/> Letra Grande <input type="checkbox"/> Cinta de Audio <input type="checkbox"/> TDD	
<input type="checkbox"/> Otro (por favor indicar) _____	
Sección II:	
6. ¿Está presentando esta queja en su propio nombre?	
<input type="checkbox"/> Sí <input type="checkbox"/> No	
(Si su respuesta es "sí" a esta pregunta, por favor vaya a la Sección III .)	
7. Si su respuesta es "no" a la pregunta 6, describa su relación con la persona (el demandante) para la que está solicitando y por qué usted está solicitando para un tercero:	
:	
8. Ha obtenido el permiso de la parte agraviada (el demandante) para presentar esta queja en su nombre?	
<input type="checkbox"/> Sí <input type="checkbox"/> No	
Sección III:	
9. ¿Ha presentado previamente una queja de Título VI con GoCary?	
<input type="checkbox"/> Sí <input type="checkbox"/> No	
10. ¿Ha presentado esta queja con cualquier otro, estatales, locales u organismos federales o con cualquier corte federal o estatal?	
<input type="checkbox"/> Sí <input type="checkbox"/> No	
11. Si "sí", por favor marque todas las que apliquen:	
<input type="checkbox"/> Agencia Federal <input type="checkbox"/> Corte Federal <input type="checkbox"/> Agencia Estatal <input type="checkbox"/> Tribunal Estatal <input type="checkbox"/> Agencia Local	

Formulario de queja de derechos civiles de GoCary

1





17. ¿Cómo puede resolverse esta queja a su satisfacción?	
18. Por favor escriba cualquier persona (s) / podemos ponernos en contacto para obtener información adicional para apoyar o clarificar su queja:	
Nombre:	Dirección:
Número De Teléfono:	
Sección V:	
Firma:	Fecha de presentación:
<p><u>Tenga en cuenta: GoCary no puede aceptar su queja sin una firma.</u></p> <p>Por favor envíe su formulario completo a:</p> <p style="margin-left: 100px;">GoCary Atención: Coordinador del Título VI PO Box 8005 Cary, NC 27512</p>	
<p>Las quejas del Título VI también se pueden presentar ante:</p> <p style="margin-left: 100px;">El Departamento de Transporte de los Estados Unidos. Atención: Gerente del programa Título VI 1200 New Jersey Avenue SE Washington, DC 20590</p>	

Appendix E – List of Title VI Investigations, Complaints, and Lawsuits

There have been no Title VI investigations, complaints or lawsuits received by the Town of Cary or the Town's contractor since the last Program update.

Appendix F – Public Participation Plan

Public Input

Public input is required for proposed Town of Cary (GoCary) transportation service improvements and changes. Town of Cary conducts public hearings and rider transit surveys to identify deficiency areas, transit rider satisfaction, and new opportunities for expansions and/or the addition of new riders.

Community workshops are also conducted to provide information and solicit feedback regarding proposed service changes and improvements.

As these efforts take place, they will be documented by service improvement and reported to the FTA in the next Title VI Program submission.

Citizens with Limited English Proficiency – Outreach Efforts

To stay current and actively help to improve access for those with limited English proficiency in and around the Town Cary, transit staff conducts and pursue multiple initiatives to maintain inclusivity for all citizen's understanding of the system and resources available to them.

Through community input processes, transit services adjustments or expansion, or general education about the public transportation system in the Town of Cary, transit staff work hard to prepare and make alert all citizens, including those with LEP needs. Staff first works to provide ample notice through signage, alerts and widespread publications to allow for citizens to be able to provide feedback on the topic/issue being advertised. On the day of the meeting, staff provides the opportunity for citizens to sign in and provide any contact information they prefer. At each meeting, staff works hard to be able to have on hand an interpreter for the language that has been recognized as the dominant one other than English. All documents/handouts that are developed for such a meeting are created with each audience in mind and are translated into the appropriate language as necessary. After any meeting, staff compiles any and all feedback – written and verbal – into a single document that is used to highlight the citizen input for future service needs and/or enhancements. Any feedback that is in a language other than English will then be effectively translated but documented in both languages.

Some examples of such outreach and provision of LEP service efforts are highlighted below:

Project Phoenix – Apartment Complex Outreach

Transit staff have partnered with an organization through the Cary Police Department called Project Phoenix. This organization's goals are to promote communication and collaboration at all apartment complexes in the Town, including those that serve predominant minority citizens. Town staff attend certain events and ensure that publications and notices are delivered to these apartment complexes on a continual basis.

Wake County Transit Plan – Long Range Planning/Long Range Transit Planning (2015-2016)

The Town of Cary has served as a partner in the County-Wide transit planning process. This has included short and long term planning for transit service enhancements per local/regional bus, bus rapid-, and commuter rail-transit opportunities. Throughout the process, there were numerous outreach efforts to assist with educating the community on the plan scenario options. While transit staff do not directly run

or are not directly in control of the outreach efforts, they helped to guide such efforts so as to maintain inclusivity of all demographics, including those with LEP needs.

Regional Call Center (Triangle Transit – Regional Service Provider) – Partnered Contract

In 2012, the Town of Cary entered into a contractual agreement with Triangle Transit and their new Regional Call Center, to serve as a centralized point of information for all transit providers in the Raleigh-Durham-Chapel Hill region and continues to this day. As a part of this service, citizens/passengers have the opportunity, if needed, to speak with a Spanish-speaking representative at all times during operation. Spanish has been determined to be the dominant secondary language of the metropolitan regions, which is why this is available at all times, but other LEP persons may also seek assistance through the regional call center and specially trained staff when necessary.

Conducting Meetings/Workshops

It is Town of Cary policy to conduct conferences, meetings and training functions in the most professional, efficient and cost-effective manner possible while ensuring compliance with all laws, rules and regulations. Meetings are conducted in person, via teleconference or videoconference depending on the needs of the participants. Each meeting includes:

A Scribe - The scribe is a Town of Cary staff member designated to take detailed notes, identify attendees of each meeting, and maintain an action item list/matrix.

An Agenda - The Agenda identifies the date, time, and location of the meeting and includes an introduction, a welcoming statement, and a list of the presentation topics, speakers, question and answer (Q&A) segments.

An Action Item List/Matrix - Compiled by the scribe, the action item list/matrix provides dates, details and status of all requests, suggestions and assignments initiated at outreach events/workshops.

Prior Meeting Minutes - Minutes of prior meeting are useful for discussions and bringing new attendees to be current on the progress of the Agency's projects, etc.

The number of outreach/workshops conducted is dependent on the breadth and scope of each project. Complex projects with large budgets typically require lengthy project timelines for completion and will require a greater number of outreach/workshops compared to smaller projects. The Town of Cary will conduct an average of two outreach/workshops a month for projects and will adjust according to the community's needs and requests, taking the Agency's resources into consideration. Outreach/workshops are intended to inform the community about Town of Cary transportation projects and increase the participation of various population groups within the service area. In addition, outreach/workshops provide an opportunity for Town of Cary to:

- Improve communication between the Town of Cary and community groups.
- Create an open dialogue to ensure that the community's needs and concerns are identified and addressed.
- Provide a forum for Town of Cary staff to share transportation goals and aspirations with the community.
- Identify additional community subgroups.

GoCary Public Involvement Activities – November 2017 – November 2019

The following public outreach activities took place since the last Title VI Program update.

Date	Time	Location	Purpose	Served by GoCary Routes	# of Attendees	Comments Received	Pictures
11/14/2017	5:30 PM - 7:30 PM	Cary Senior Center 120 Maury Odell Pl Cary, NC 27513	Project Prioritization on Wake Transit Implementation Plan	4	14	<ul style="list-style-type: none"> • Prioritize rail improvements over BRT • Preference for TOD at rail stations • GoCary Route 5's loop should be increased to capture possible office development 	Senior Center Pictures
11/16/2017	1:00 PM - 3:00 PM	Cary Arts Center 101 Dry Ave Cary, NC 27511	Project Prioritization on Wake Transit Implementation Plan	5	27	<ul style="list-style-type: none"> • Excited about increase in frequency along the routes • Some bus shelters do not have good bus number signage, which makes it difficult to call-in issues and concerns 	Pictures
4/28/2018	9:00 AM - 5:00 PM	Spring Daze Arts & Crafts Festival Bond Park 801 High House Rd Cary, NC 27519	General Wake Transit Outreach / GoCary Service Education	4			Spring Daze Pictures
5/1/2018	5:30 PM - 7:30 PM	Cary Arts Center Paul Cooper Room 101 Dry Ave	General Wake Transit Outreach / GoCary Service Education	5			

		Cary, NC 27511					
5/2/2018	10:30 AM - 12:00 PM	Senior Citizen Day Cary Senior Center 120 Maury O'Dell Pl Cary, NC 27519	General Wake Transit Outreach / GoCary Service Education	4			Senior Citizen's Day Pictures
5/12/2019	12:00 PM - 6:30 PM	Diamante's Ritmo Latino Festival 315 N. Academy Street Cary, NC 27513	General Wake Transit Outreach / GoCary Service Education	3,4,5,6			Ritmo Latino Pictures
5/16/2018	6:00 AM - 8:00 AM	Cary Train Depot 211 N. Academy Street Cary, NC 27513	General Wake Transit Outreach / GoCary Service Education	3,4,5,6			Cary Depot Pictures
5/16/2018	5:00 PM - 7:00 PM	Cary Train Depot 211 N. Academy Street Cary, NC 27513	General Wake Transit Outreach / GoCary Service Education	3,4,5,6			

5/18/2018	9:00 AM - 2:00 PM	Wheels on Academy S. Academy Street Cary, NC 27513	General Wake Transit Outreach / GoCary Service Education	3,4,5,6			
7/31/2018	5:30 PM - 7:30 PM	Page Walker Arts & History Center 1st Floor 119 Ambassador Loop Cary, NC 27513	Western Wake COA Public Meeting	3,4,5,6	15		Page Walker Picture
8/25/2018	9:00 AM - 5:00 PM	Lazy Daze Summer Festival Town of Cary 316 N. Academy Street Cary, NC 27513	Wake Transit BRT Options / Western Wake COA Outreach	3,4,5,6	75	-Support for Holly Springs Express -Desire for route that extends further into Western Cary -Support for bus plan while desire to accelerate implementation -Interest in GoCary Door-To-Door Shuttles	Lazy Daze Pictures
8/26/2018	1:00 PM - 5:00 PM	Lazy Daze Summer Festival Town of Cary 316 N. Academy Street Cary, NC 27513	Wake Transit BRT Options / Western Wake COA Outreach	3,4,5,6	60	- Interest in Door-to-Door and funding assistance programs for AA/addiction rehabilitation programs - Time it takes to get from Cary to Durham on the bus is unreasonable - Lots of interest in the Youth Pass - Public wants to see some construction, ready for projects to get started	

8/29/2018	5:30 PM - 7:30 PM	Cary Arts Center 101 Dry Ave Cary, NC 27511	Wake Transit BRT Options / Western Wake COA Public Meeting	5	20	<ul style="list-style-type: none"> - Support for bus plan while desire to accelerate implementation - Route 310 (Cary Depot to Wake Tech Campus to RTC 1) - should not continue on NC 54 due to congestion and lack of safe bike/pedestrian accommodations - Routes should be more direct with less zigzag and stops - focus on connectivity - Direct route desired from Walnut to Cary Depot 	Arts Center Pictures
10/17/2018	5:30 PM - 7:30 PM	Town of Cary Jordan Hall 908 N Harrison Ave Cary, NC 27513	GoCary Service Changes Public Meeting	3		Public Comments	
10/18/2018	7:00 AM - 9:00 AM	Cary Train Depot 211 N. Academy Street Cary, NC 27513	GoCary Service Changes Public Meeting	3,4,5,6			
10/18/2018	3:30 PM - 6:30 PM	Cary Towne Center Mall 1105 Walnut St Cary, NC 27511	GoCary Service Changes Public Meeting	1,2,6			
1/24/2019	6:30 PM	Cary Town Council Meeting	GoCary Service Changes Public Hearing	3,4,5,6			

		316 N. Academy Street Cary, NC 27513					
3/20/2019	12:30 PM - 2:15 PM	Weatherstone Spring 200 Weather Ridge Lane Cary, NC 27513	GoCary Service Changes Public Meeting	4	21	-Need direct service to shopping center -Would like a shuttle like service	
4/10/2019	3:30 PM - 5:00 PM	Glenaire Retirement Community 4000 Glenaire Circle Cary, NC 27511	General GoCary Service Education	1, 2, 3, 4, 5, 6	~50		
6/1/2019	8:30 AM - 2:30 PM	Wrenn Drive Block Party	General Wake Transit Outreach / GoCary Service Education	5			
6/11/2019	1:00 PM - 2:00 PM	Highland Village Commons 600 Malcolm Valley Place Cary, NC 27511	GoCary Service Changes Public Meeting	4	52	-Leave the route and stop as is -Need service to shopping center	Highland Village Pictures
6/14/2019	1:00 PM - 3:00 PM	Serving Cup Green Level Apartments	GoCary Service Changes Public Meeting	4	3	-improve accessibility and connectivity to bus stop	

		14000 Joshua Tree Court Cary, NC 27519					
7/19/2019	2:30 PM - 3:30 PM	Weatherstone Spring 200 Weather Ridge Lane Cary, NC 27513	GoCary Service Changes Public Meeting	4	18	-like the idea of a fixed route that still goes to shopping centers	
7/30/2019	12:30 PM - 1:30 PM	Cary Town Hall 16 N. Academy Street Cary, NC 27513	GoCary Service Changes Education Meeting	4	2	-walk to and from new bus stop location would be too long -safety concerns with crossing a busy street to get to new bus stop location -likes idea of a fixed route that still goes to shopping centers	
8/24- 25/2019	1:00 PM - 5:00 PM	Lazy Daze Summer Festival Town of Cary 316 N. Academy Street Cary, NC 27513	General Wake Transit Outreach / GoCary Service Education	1, 2, 3, 4, 5, 6	>200		
8/28/2019	2:15 PM- 3:45 PM	Highland Village Commons 600 Malcolm Valley Place Cary, NC 27511	GoCary Service Changes Public Meeting	4	1	-excited about revised service changes	

10/8/2019	10:30 AM - 11:30 AM	Sunrise of Cary 1206 W Chatham Street Cary, NC 27513	General Wake Transit Outreach / GoCary Service Education	1, 2, 3, 4, 5, 6	7		
10/11/2019	10:00 AM - 11:00 AM	Cary Senior Center 120 Maury Odell Pl Cary, NC 27513	General Wake Transit Outreach / GoCary Service Education	1, 2, 3, 4, 5, 6	20		
11/4/2019	4:00 PM - 7:00 PM	Raleigh Union Station 510 W Martin Street Raleigh, NC 27601	General Wake Transit Outreach / GoCary Service Change Education w/Stakeholders	1, 2, 3, 4, 5, 6	~50		

Town of Cary – GoCary

Language Assistance
Plan

December 2019

Introduction

Most individuals in the United States read, write, speak and understand English. However, there are many individuals whose primary language is not English. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English may be Limited English Proficient, or “LEP.” This language barrier may prevent individuals from accessing services and benefits.

There are two pieces of legislation that establish the manner in which agencies which are recipients of federal funds must address the needs of LEP persons. Title VI of the Civil Rights Act of 1964 and Executive Order 13166 clarifies requirements for LEP persons under Title VI.

Title VI of the Civil Rights Act of 1964 and implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state and local agencies, and governments, private and non-profit entities, and subrecipients. The purpose of this LEP guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation and assist them in fulfilling their responsibilities to LEP persons. The Executive Order also requires agencies to examine the services it provides and develop and implement a Language Implementation Plan which includes a system by which LEP persons can meaningfully access those services.

Plan Summary

The Town of Cary has developed this Limited English Proficiency Plan (LEP) to ensure that LEP persons will have meaningful access to its services as required by Executive Order 13166.

The plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, the manner in which staff should be trained, how to notify LEP persons that assistance is available, and monitoring and updating future plan updates.

To develop its Plan, The Town of Cary’s undertook the U.S. Department of Transportation four factor LEP analysis which considers: 1) The number or proportion of LEP persons eligible to be served or likely to encounter a program, activity or service of The Town of Cary; 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 Town of Cary to people’s lives; and 4) the resources available to The Town of Cary and implementation costs. A brief description of the self-assessment undertaken in each of these areas follows.

Four-Factor Analysis

1. **The number or proportion of LEP persons eligible to be served or likely to encounter a program, activity or service of The Town of Cary.** The Town of Cary examined several data sources for

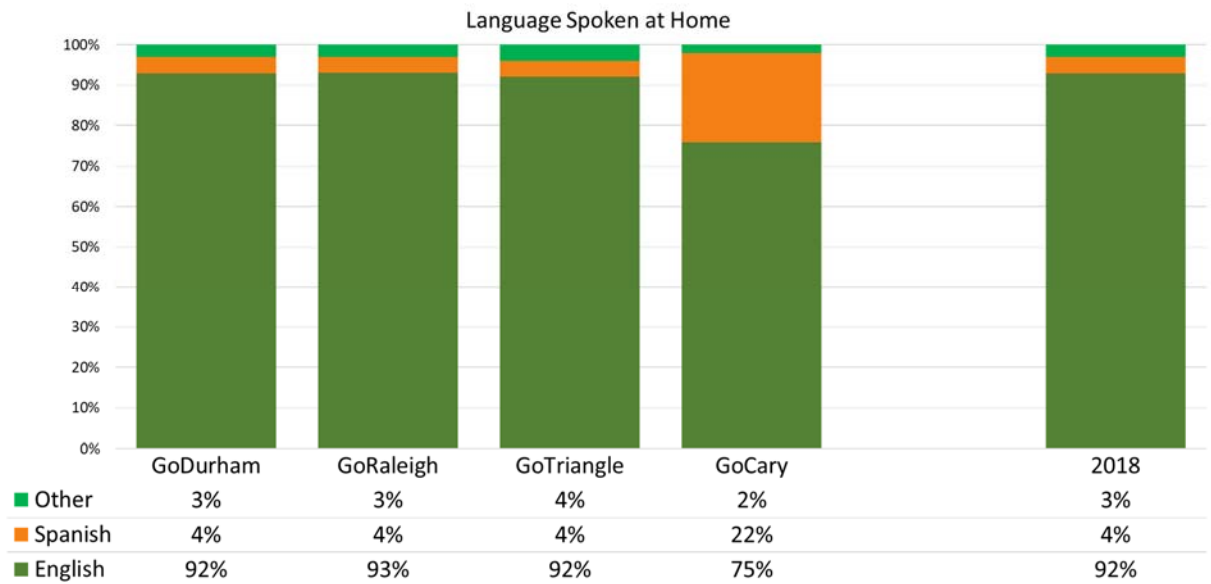
demographic data of its service areas to assess whether there were any underserved LEP populations.

The Town of Cary reviewed information the U.S. Census Bureau; American Community Survey (ACS) for 2011 - 2015 for Wake County, NC. While the GoCary service area comprises much less than Wake County, this was the smallest geographic unit readily available.

In Wake County approximately 16.52% or 150,511 people age 5 and older spoke a language other than English at home. Approximately 6.04% of respondents speak English less than “very well.” In Wake County, 76,141 respondents or 8.36% speak Spanish at home. 3.71% of respondents in Wake County who speak Spanish at home speak English less than very well. The next most used languages spoken at home Chinese and Other Asian languages which comprise approximately 18,564 or 2.04% percent of persons in the county. 0.58% of respondents who speak Asian and Pacific Islander languages at home speak English less than very well.

American Community Survey 2011-2015. Detailed Languages Spoken at Home and Ability to Speak English for the Population 5 Years and Over for Wake County, NC (Data Release Date: December 2016)

	Number of speakers	Percentage of Total Number of speakers	Margin of Error	Speak English less than "Very Well"	Margin of Error
Population 5 years and over	910,956		+/-48		
Speak only English	760,445	83.5%	+/-2,892	(X)	(X)
Spanish or Spanish Creole:	76,141	8.4%	+/-1,615	33,816	+/-1,682
French (incl. Patois, Cajun):	4,074	0.4%	+/-667	955	+/-335
French Creole:	530	0.1%	+/-291	102	+/-68
Italian:	1,177	0.1%	+/-281	95	+/-54
Portuguese or Portuguese Creole:	1,030	0.1%	+/-277	194	+/-152
German:	2,238	0.2%	+/-359	310	+/-124
Yiddish:	18	0.0%	+/-20	8	+/-14
Other West Germanic languages:	594	0.1%	+/-191	41	+/-33
Scandinavian languages:	581	0.1%	+/-269	77	+/-65
Greek:	505	0.1%	+/-158	103	+/-86
Russian:	1,269	0.1%	+/-332	386	+/-154
Polish:	492	0.1%	+/-219	184	+/-106
Serbo-Croatian:	220	0.0%	+/-136	63	+/-73
Other Slavic languages:	620	0.1%	+/-205	177	+/-90
Armenian:	52	0.0%	+/-50	0	+/-28
Persian:	1,610	0.2%	+/-589	394	+/-196
Gujarati:	3,653	0.4%	+/-850	1,227	+/-414
Hindi:	6,121	0.7%	+/-955	706	+/-287
Urdu:	1,683	0.2%	+/-503	318	+/-142
Other Indic languages:	4,118	0.5%	+/-737	1,497	+/-431
Other Indo-European languages:	1,274	0.1%	+/-512	295	+/-226
Chinese:	9,321	1.0%	+/-1,075	3,688	+/-621
Japanese:	896	0.1%	+/-229	341	+/-140
Korean:	3,283	0.4%	+/-680	1,616	+/-378
Mon-Khmer, Cambodian:	263	0.0%	+/-149	120	+/-84
Hmong:	201	0.0%	+/-203	0	+/-28
Thai:	331	0.0%	+/-210	206	+/-175
Laotian:	246	0.0%	+/-170	86	+/-78
Vietnamese:	4,040	0.4%	+/-1,043	2,404	+/-769
Other Asian languages:	9,243	1.0%	+/-1,121	1,587	+/-428
Tagalog:	1,490	0.2%	+/-407	414	+/-178
Other Pacific Island languages:	666	0.1%	+/-352	326	+/-230
Navajo:	0	0.0%	+/-28	0	+/-28
Other Native North American languages:	206	0.0%	+/-135	0	+/-28
Hungarian:	268	0.0%	+/-159	45	+/-38
Arabic:	6,464	0.7%	+/-1,522	1,687	+/-379
Hebrew:	200	0.0%	+/-96	16	+/-18
African languages:	5,115	0.6%	+/-928	1,475	+/-436
Other and unspecified languages:	278	0.0%	+/-225	83	+/-105



According to the 2018 Triangle Region Passenger Surveys

2. **The frequency with which LEP individuals come in contact with the program.** The Town of Cary accesses the frequency at which staff has or could possibly have contact with LEP persons. This includes examining census data, documenting phone inquiries, requests for translated documents, and staff and bus operator feedback.
3. **The nature and importance of the program, activity or service provided by The Town of Cary to people's lives.** According to the 2000 Census (2010 Census does not include any LEP data), more than 11 percent of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about 4 percent those persons being English speakers. In order to accommodate the LEP population, predominantly Spanish-speaking individuals, the Town of Cary has updated its website to include a Title VI Notice to the Public protections in Spanish. Some of The Town of Cary bus operators and regional call center representatives also speak Spanish.
4. **The resources available to the recipient and costs.** The Town of Cary assessed its available resources that could be used to provide LEP assistance. This included identifying bilingual staff, how much a professional interpreter and translation service would cost, determining which documents should be translated, and deciding what level of staff training is needed.

After analyzing the four factors outlined in the U.S. DOT policy guidance, The Town of Cary developed the following plan for providing language assistance to LEP persons.

Components of the Plan

There are five areas that comprise The Town of Cary's LEP plan:

1. Identifying LEP individuals who need language assistance
2. Language assistance measures

3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the LEP plan

Identifying LEP individuals that need language assistance

The Town of Cary will review demographic data every three years or when there is a major service change and solicit data from the LEP community to identify language assistance needs within its service areas.

- Based on the U.S. Census Bureau; American Community Survey (ACS) for 2011 - 2015 and the Triangle Region Transit Passenger Survey demographic data, Spanish speaking LEP persons are the primary group requiring language assistance in The Town of Cary's service areas and in calls to The Town of Cary's Regional Call Center service provided by GoTriangle.
- We will continue to monitor and evaluate our agency's efforts based on requests for LEP assistance and adjust or change as needed.
- There are several measures that can be taken to identify persons who may need language assistance in our service area, with emphasis on our primary group requiring help:
 - Send out notifications in Spanish of upcoming events/meeting(s).
 - Select locations that may be more convenient for LEP persons; send out the notices in Spanish.
 - Include a sign in Spanish and a Spanish speaking person at the desk.
 - When open houses or public meetings are held, set-up a sign-in table and have a staff member greet and briefly speak to each attendee in order to informally gauge his/her ability to speak and understand English.
 - Have the Census Bureau's "I Speak Cards" at various events. Although staff may not be able to provide translation assistance at the time, the cards are an excellent tool to identify language needs for future events/meetings. Also, have the cards available at the Regional Transit Center (RTC).
 - Post a notice of available language assistance at open houses/public meetings to encourage LEP persons to self-identify.
 - Examine record requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.
 - Survey bus operators periodically and other staff who have contact with LEP individuals to record language assistance requests.

Language Assistance Measures

The Town of Cary has or will implement the following LEP measures:

- Users of the Town of Cary's website have online access to Google Translate, the online language translation service which allows users to translate to and from Spanish and 56 other languages.
- Census Bureau's "I Speak Spanish Cards" are in the RTC and provided on board each vehicle.
- Bilingual call center staff is available for Spanish LEP language assistance and also to respond or interpret correspondence in Spanish. Call center staff are also responsible for recording complaints and forwarding them to the Customer Service Manager (CSM). Complaints that come under Title VI are forwarded by the CSM to the designated department for appropriate action.

- Provide pocket guide, “Basic Spanish for Transit Employees” for operators and staff with basic Spanish words and phrases.
- Onboard survey
- Provide translators for all public hearings and meetings (upon request) and translated news releases to supplement the availability of Google Translate to our audiences.
- Several bus operators speak Spanish. Operators are the most direct point of contact for LEP persons. However, if the operator is not bilingual, they are instructed to use the Census Bureau’s “I Speak Spanish Cards”. Bus operators may then ask for assistance from a bilingual passenger. If there is no one on the bus who can offer language assistance, the operator contacts dispatch for assistance.
- Signs related to life safety issues will display text in English and Spanish.
- Signs which provide transit patrons with general directions and route and service information will include international symbols, numbers and place names. This policy is currently being applied as follows:
 - Way Finding signs in the vicinity of the Administrative Office building and Regional Transit Center will include international symbols and directional arrows;
 - Bus route signs on the bus platform will include international symbols; route numbers, and route origin and destination names which would be the same in any language.

At a minimum, the following vital documents will be translated into Spanish:

- Title VI Public Notice
- Title VI Complaint Form
- ADA Complaint Procedures
- Door to Door Registration Form
- Bus System Map and Schedules

Training Staff

It is important that staff members, especially those having contact with the public know their obligation to provide meaningful access to information and services for LEP persons. Bus operators have the most frequent contact with LEP persons, through daily interaction with passengers. The Town of Cary will or has implemented the following procedures. During orientation the Training Coordinator will provide a “summary” copy of the Title VI Program and LEP Plan to new staff to be aware and understand their role; and

- Become aware of and understand Title VI and LEP responsibilities;
- Language assistance services The Town of Cary offers;’
- Use of LEP “I Speak Cards”;
- Specific procedures to follow when encountering an LEP person;
- Document/report language assistance requests; and
- Copies of the LEP Plan will also be distributed to all managers to disseminate plan information to appropriate administrative staff. A copy of the LEP video “Breaking Down the Language Barrier: Translating Limited English Proficiency into Practice” has been requested to be used in training.

Providing Notice to LEP Persons

The Town of Cary has or will implement the following outreach efforts:

- A statement on its website in Spanish indicating the language assistance is available free of charge;
- Public meetings and open house announcement should include a tagline in Spanish affirming that the Town of Cary will make reasonable accommodations to translate any materials into Spanish, (or other language) or provide an interpreter;
- Major service changes including fare changes that require legal notice advertising are translated into Spanish. The translated notices are posted in public locations, major stops, vehicles and the RTC;
- Post notices to inform the public that Spanish speaking personnel are available to aid in translation at the RTC by telephone at the GoTriangle RTC;
- Include notices in local newspapers in Spanish.

Monitoring and updating the LEP Plan

This plan is designed to be flexible, and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services, and to update the LEP Plan when appropriate. At a minimum, The Town of Cary will follow the Title VI Program update schedule for the LEP Plan. Each update should examine the following:

- How many LEP persons were encountered?
- Is the existing language assistance meeting the needs of the LEP persons?
- What is the current LEP population in The Town of Cary's service area?
- Has there been a change in the types of languages where translation services are needed?
- Do staff members understand the LEP Plan policies and procedures?
- Were any complaints received?

There are several methods that can be used to assist in answering these questions. One method is to review customer comments and complaints to determine if services are accessible to the LEP community. Feedback from the LEP community will be sought through community outreach events and presentations to determine the effectiveness of the plan in reaching LEP persons. Census data will also be reviewed as it becomes available to determine changes in the LEP population.

Dissemination of the Limited English Proficient Plan

The Town of Cary includes the LEP Plan with its Title VI Policy and Complaint Procedures. The Notice of Rights under Title VI to the public is posted on The Town of Cary's website and in transit vehicles. Copies of the plan will be provided to any person or agency requesting a copy.

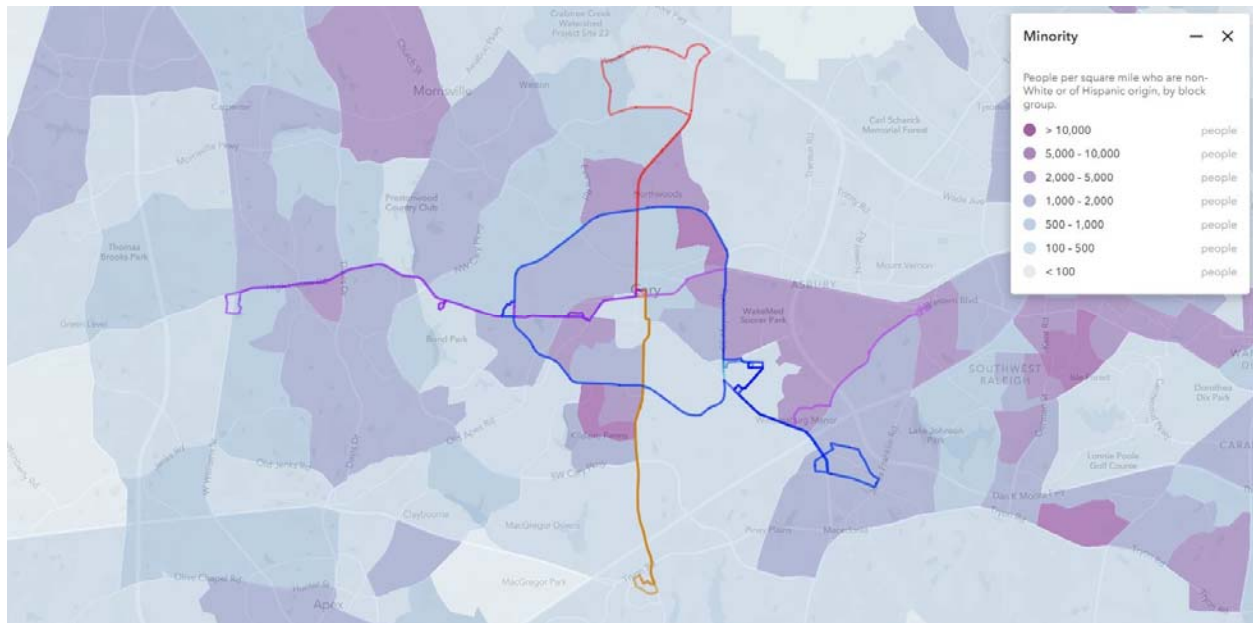
Any questions or comments regarding this plan should be directed to:

Title VI Coordinator
Transportation Program Coordinator
PO Box 8005

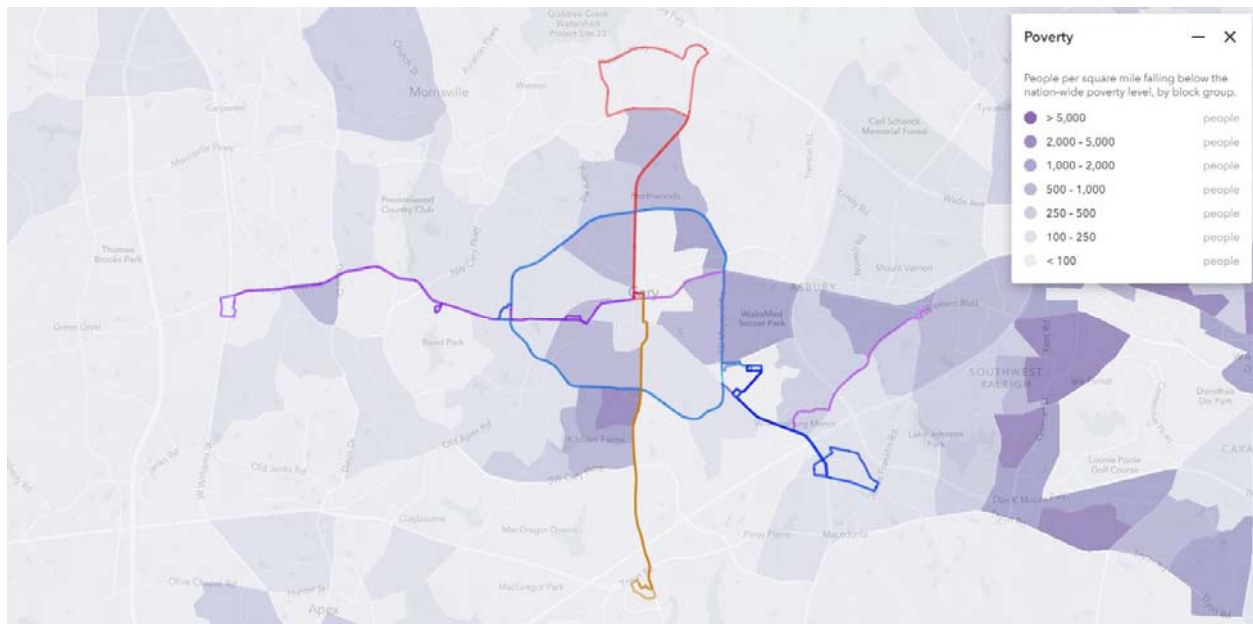
Cary, NC 27512
Phone (919) 653-7141
Fax (919) 380-6426

Appendix H – Demographic Maps

Minority Population Map for Current Service (data provided from Remix software)



Low Income Population Map for Current Service (data provided from Remix software)



Appendix I – Title VI Program Town Council Approval

RESOLUTION OF THE CARY TOWN COUNCIL

WHEREAS, the Town of Cary ("Town") views the diversity of its population as a strength and is strongly opposed to acts of discrimination; and

WHEREAS, the Town Council recognizes the importance of ensuring practices are in place that mitigate the possibility of unintentional discrimination; and

WHEREAS, as a recipient of federal grant funding the Town's transit system must comply with the Federal Transit Administration's regulations in regard to Title VI of the Civil Rights Act of 1964 and document such practices in its Title VI Program.

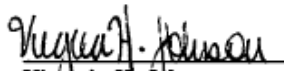
NOW THEREFORE, be it resolved by the Town Council of the Town of Cary:

The Town Council hereby approves the attached "Town of Cary (GoCary) Title VI Program" ("Program") and authorizes the Town Manager or designee to submit Program to the Federal Transit Administration and to take such actions as contemplated in Program.

Adopted this the 23rd day of January 2020.


Harold Weinbrecht, Jr. Mayor

ATTEST:


Virginia H. Johnson,
Town Clerk

