



*City Of Raleigh*  
*North Carolina*

## **TITLE VI PROGRAM**

### **Limited English Proficiency [LEP] Plan**

#### **Introduction**

The Raleigh Transit Authority (RTA) is a transportation policy-making board responsible for planning and prioritizing transportation projects within the Urbanized Area, as defined by the US Census Bureau. The RTA works with the public, planning organizations, government agencies, elected officials, and community groups to develop transportation plans and programs through a continuing, cooperative, and comprehensive planning process. This planning process guides the use of Federal and State dollars spent on existing and future transportation projects and programs. This plan was developed to guide the MPO in its administration and management of Title VI-related activities. The Limited English Proficiency (LEP) portion of the plan ensures that individuals with limited English proficiency have meaningful access to the transportation planning process.

#### **Title VI-Related Legislation**

Section 601 of Title VI of the Civil Rights Act of 1964, codified as amended at 42 U.S.C. § 2000d, 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.” Consistent therewith, and in accordance with section 602 of Title VI, codified as amended at 42 U.S.C. § 2000d-1, the Department of Justice promulgated regulations prohibiting recipients of federal funds from “utilizing criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects individuals of a particular race, color, or national origin.” 28 C.F.R. § 42.104(b)(2). The United States Department of Transportation later promulgated nearly identical regulations - See 49 C.F.R. § 21.5(b) (vii) (2). In 1974, the United States Supreme Court held, in *Lau v. Nichols*, 414 U.S. 563 (1974), that Title VI prohibits conduct that has a disproportionate effect on LEP persons, because such conduct is tantamount to national origin discrimination. In *Lau*, a San Francisco school district, with a significant number of non-English speaking students of Chinese origin, was required to take reasonable steps to provide its non-English speaking students with a meaningful opportunity to participate in federally funded educational programs. The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms “programs or activities” to include all programs and activities of Federal Aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100-259 {S.557} March 22, 1988). In 1994, a Presidential Order directed every Federal agency to make Environmental Justice (EJ) part of its mission. Executive Order 12898 states:

*"Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."*

The DOT's goal is to avoid any needless obstacles for project developers and communities. The US DOT is committed to the principles of EJ, which include:

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

Environmental justice goals should be considered throughout transportation planning and project development, and throughout all public outreach and participation efforts conducted by the US DOT and their grantees, including the Raleigh Urban Area MPO. The Raleigh Urban Area MPO's Long Range Transportation Plan contains a chapter dedicated to the environmental justice topic. To further clarify rights protected by Title VI, President William J. Clinton, on August 11, 2000, issued Executive Order 13166, Improving Access to Service for Person with Limited English Proficiency. Executive Order 13166 requires each federal agency to examine its programs and activities and to develop and to implement plans by which LEP persons can meaningfully access those programs and activities. That Executive Order includes the statement below.

*Each Federal Agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.*

On that same date, in conjunction with Executive Order 13166, the Department of Justice issued a general guidance document setting forth various principles for agencies to consider in developing guidance documents for recipients of federal funds. See Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination against Persons with Limited English Proficiency, 65 Fed. Reg. 50123 (Aug. 16, 2000).

The following matrix illustrates and summarizes these laws, policies and considerations:

<b>Title VI of the Civil Rights Act of 1964</b>	<b>Limited English Proficiency Executive Order 13166</b>
Federal Law	Federal Policy
Enacted in 1964	Enacted in August 2000
Considers all persons	Considers eligible population
Contains monitoring and oversight compliance review requirement	Contains monitoring and oversight compliance review requirements
Provides protection on the basis of race, color, national origin, and subsequently expanded to include sex, age, or disability	Provides protection on the basis of national origin
Focuses on eliminating discrimination in federally funded programs	Focuses on providing LEP persons with meaningful access to services using four factor criteria

**Limited English Proficiency**

Compliance with Title VI includes Limited English Proficient (LEP) persons. The Limited English Proficiency (LEP) portion of this plan addresses Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color or national origin. In 1974, the U.S. Supreme Court affirmed that the failure to ensure a meaningful opportunity for national origin minorities, with limited-English proficiency, to participate in a federally funded program violates Title VI (Federal-Aid Recipient Programs & Activities) regulations. Additionally, requirements are outlined in Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency signed on August 11,2000. Its purpose is to ensure accessibility to programs and services to eligible persons who have limited proficiency in the English language. Furthermore, the U.S. Department of Transportation (DOT) published Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons in the December 14, 2005 Federal Register Volume 70; Number 239. The guidance explicitly identifies Metropolitan Planning Organizations (MPOs) as organizations that must follow this guidance. The Limited English Proficiency (LEP) Plan must be consistent with the fundamental mission of the organization, though not unduly burdening the organization.

**Plan Summary**

The Raleigh Transit Authority has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wishes to access services provided by the transit authority. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, RTA undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a RTA program, activity or service.
  2. The frequency with which LEP persons come in contact with RTA programs, activities or services.
  3. The nature and importance of programs, activities or services provided by RTA to the LEP population.
  4. The resources available to RTA and overall cost to provide LEP assistance.
- A summary of the results of the RTA four-factor analysis is in the following section.

### **Four-Factor Analysis**

#### **1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a City of Raleigh program, activity or service.**

The MPO will assess the language needs of the population to be served. To identify the language and number of LEP persons the Capital Area Transit may encounter, City staff will review:

- Census Data
- School system data
- Community agency data
- Interviews with MPO members to determine frequency of contact with LEP individuals and what language was encountered

The first step towards understanding the profile of individuals that could participate in the transportation planning process is a review of Census data. Tables 1 on the following pages display the primary language spoken and number of individuals that are LEP as measured by. For our planning purposes, we are considering people that speak English “not well” or “not at all” and only the top four language groups are included in the analysis.

## Census Data:

### Demographics of the City of Raleigh and Wake County

#### Wake County Population and Races

As of 2010, the total population of Wake County is 900,993, which is 43.51% more than it was in 2000. The population growth rate is much higher than the state average rate of 18.46% and is much higher than the national average rate of 9.71%. The Wake County population density is 1,050.94 people per square mile, which is much higher than the state average density of 177.18 people per square mile and is much higher than the national average density of 81.32 people per square mile. The most prevalent race in Wake County is white, which represent 66.32% of the total population. The average Wake County education level is higher than the state average and is higher than the national average.

Wake County, North Carolina - Overview	2010 Census		2000 Census		2000-2010 Change	
	Counts	Percentages	Counts	Percentages	Change	Percentage s
Total Population						
Total Population	900,993	100.00%	627,846	100.00%	273,147	43.51%
Population by Race						
American Indian and Alaska native alone	4,503	0.50%	2,152	0.34%	2,351	109.25%
Asian alone	48,553	5.39%	21,249	3.38%	27,304	128.50%
Black or African American alone	186,510	20.70%	123,820	19.72%	62,690	50.63%
Native Hawaiian and Other Pacific native alone	387	0.04%	212	0.03%	175	82.55%
Some other race alone	40,928	4.54%	15,548	2.48%	25,380	163.24%
Two or more races	22,566	2.50%	10,321	1.64%	12,245	118.64%
White alone	597,546	66.32%	454,544	72.40%	143,002	31.46%
Population by Hispanic or Latino Origin (of any race)						
Persons of Hispanic or Latino Origin	87,922	9.76%	33,985	5.41%	53,937	158.71%
Persons Not of Hispanic or Latino Origin	813,071	90.24%	593,861	94.59%	219,210	36.91%
Population by Gender						
Male	438,792	48.70%	311,436	49.60%	127,356	40.89%
Female	462,201	51.30%	316,410	50.40%	145,791	46.08%
Population by Age						
Persons 0 to 4 years	65,495	7.27%	45,142	7.19%	20,353	45.09%
Persons 5 to 17 years	169,118	18.77%	112,455	17.91%	56,663	50.39%
Persons 18 to 64 years	589,831	65.46%	423,877	67.51%	165,954	39.15%

Persons 65 years and over                      76,549 8.50%                      46,372 7.39%                      30,177 65.08%

Wake County has experienced explosive growth over the last 10 years. In 2000, Wake County had a total population of 627,846 residents. As of the 2000 Census count, the racial makeup in Wake County consisted of 72.40% White, 19.72% Black or African American, 0.34% American Indian and/or Native Alaskan, 3.38% Asian, 0.03% Pacific Islander, 5.41% were Hispanic or Latino of any race, 2.48% from other races, and 1.64% from two or more races.

According to the 2010 Census estimates, there were 900,993 people, of which 438,792 were male and 462,201 were female, residing in Wake County. As depicted in the table below, the racial makeup of the County was 66.32% White, 20.7% were Black/African American, 0.50% were American Indian and/or Alaskan Native, 5.39% were Asian, 9.76% were of Hispanic or Latino origin, 4.54% were some other race, and 2.50% were two or more races.

Based on this data, Wake County has seen a 31.46% increase in the percentage of the White population, 50.63% increase in the Black or African American population, 128.50% increase in the Asian population, 158.71% increase in the Hispanic or Latino population, 163.24% increase of the population from some other race, and a 118.64% increase in the population that reported as being from two or more races.

Wake County has become more racially diverse. Whites have remained the majority race, with fluctuations in the Black/African American and Hispanic/Latino populations.

Income and Poverty			
Geographic Area	Median Household Income	Median Family Income	Poverty Rate*
United States	\$50,046	\$60,609	15.3%
North Carolina	\$43,326	\$52,920	17.5%
Durham County	\$47,401	\$60,991	18.8%
Johnston County	\$45,988	\$52,383	16.6%
Orange County	\$48,207	\$80,117	20.1%
Wake County	\$61,426	\$77,275	12.0%

**TABLE 2**  
**Limited English Proficiency Student Enrollment**  
**2011-2012 Wake County Public Schools**

<b>MEMBERSHIP TRENDS</b>								
<b>Level</b>	<b>Membership, Month 1 (PMR Report)</b> ( <a href="#">Download 10-Year Membership by School Excel, PDF</a> )				<b>Annual Increase</b>			
	<a href="#">2008-09</a>	<a href="#">2009-10</a>	<a href="#">2010-11</a>	<a href="#">2011-12</a>	<a href="#">2008-09</a>	<a href="#">2009-10</a>	<a href="#">2010-11</a>	<a href="#">2011-12</a>
	<b>Elementary</b>	67,508	67,790*	69,140	70,564	1,828	282*	1,350
<b>Middle</b>	30,921	31,584	32,742	33,750	946	663	1,158	1,008
<b>High</b>	39,277	40,225	41,407	42,373	930	948	1,182	966
<b>WCPSS Total</b>	<b>137,706</b>	<b>139,599</b>	<b>143,289</b>	<b>146,687</b>	<b>3,704</b>	<b>1,893</b>	<b>3,690</b>	<b>3,398</b>
<b>Percent</b>					<b>2.76%</b>	<b>1.37%</b>	<b>2.64%</b>	<b>2.37%</b>

Note 1: 2009-10 Kindergarten enrollment was lower than prior years because of a one-year impact from the change in the age cut-off for kindergarten enrollment (from October 15 to August 31, 2009).

<b>District Membership</b>	<a href="#">American Indian or Alaska Native</a>	<a href="#">Asian</a>	<a href="#">Black or African American</a>	<a href="#">Hispanic or Latino</a>	<a href="#">Native Hawaiian or Other Pacific Islander</a>	<a href="#">Two or More Races</a>	<a href="#">White</a>
<b>146,687</b>	<b>548</b>	<b>9,178</b>	<b>36,225</b>	<b>21,960</b>	<b>153</b>	<b>6,326</b>	<b>72,297</b>
<b>Percent</b>	<b>0.4%</b>	<b>6.3%</b>	<b>24.7%</b>	<b>15.0%</b>	<b>0.1%</b>	<b>4.3%</b>	<b>49.3%</b>

Note 2: WCPSS is reporting race-ethnicity data following the Census Bureau-driven changes and the US Department of Education new standards for data collection and reporting. For example, **Multi-Racial** students can now identify the different parts of their heritage, **Hispanic or Latino** ethnicity is now treated separately from racial background, and the former "**Asian or Pacific Islander**" category has been split into two categories to distinguish students of Native Hawaiian/Pacific Islander race. See [New- Old Race-Ethnicity Categories, 2010-11](#).

<b>District Membership</b>	<a href="#">Free and Reduced-Price Lunch Program (FRPL)</a> (as of 10-25-11)	<b>Limited English Proficiency (LEP)</b> (as of 10-25-11)	<b>English as a Second Language (ESL)</b> (as of 10-25-11)	<b>Special Education Services</b> (as of 12-1-11)
<b>146,687</b>	<b>48,881</b>	<b>11,040</b>	<b>5,913</b>	<b>19,587</b>
<b>Percent</b>	<b>33.3%</b>	<b>7.5%</b>	<b>4.0%</b>	<b>13.4%</b>

**School System Data:**

Student enrollment data regarding enrollment to her 2011-2012 school calendar year was collected for Wake County Public School System. The table listed shows all the schools within the Wake County Public School System, the total number of students attending each school, and the total number of students identified as LEP students in each school.

The analysis shows that 7.5% of school students attending schools within the Raleigh Transit Authority service area boundary are classified a LEP.

**Community agency data**

Literacy Council of Wake County

Data was collected from Wake County Literacy Staff and Volunteers. This organization promotes literacy in Wake County through trained volunteer tutors who provide one on one and small group tutoring to adults with limited reading, writing or English speaking/literacy skills.

There are currently students and adults in that organization's Adult Basic Education (ABE) and English as a Second Language (ESL) classes originating from 37 different countries. A large portion of the adults and students (70%) are native Spanish speakers and compromise the largest language percentage of the group.

Wake Tech Community College (WTCC) -- English as a Second Language Program. The Community College located within the Raleigh service area has an established ESL program. In addition, there are other programs such as Adult High School, and high School Equivalent program in Espanol (HEP). Over the years, WTCC's ESL (English as a Second Language) program has served students from over 80 countries. ESL is a program of instruction designed to help adults whose native language is not English. Classroom instruction is offered at several levels ranging from beginning to advanced levels. Classes are designed to help improve a student's English reading, writing, listening, and speaking skills. All ESL courses help learners develop life skills required for living and working in the United States.

The most recent data available is for the 2010-2011 school year. WTCC's ESL program has served 737 students during the 2010-2011 school year. The first language spoken by students is Spanish - which comprises approximately 70% of students in this program. The program served students from 37 different countries.

**Interviews with Raleigh Transit Authority stakeholders members**

Staff conducted interviews with members of a variety of key stakeholders in the RTA service area regarding their contact with LEP individuals and the languages encountered. The interviews revealed that a variety key stakeholder had contact with LEP individuals with their work and associations. On a lot instances where these members do have contact with LEP individuals, the language spoken by the LEP individual was Spanish. Our key stakeholders noted that it is common for individuals to be accompanied by another person with bilingual abilities.

## Summary of Factor 1 Findings:

The first factor identifies Spanish as the most significant language spoken by the LEP population in the Raleigh Urbanized Service Area. Data collected from community agencies further supports this finding. A survey of MPO members indicates contact with LEP persons occurs rarely.

### **2. The frequency with which LEP persons come in contact with City of Raleigh programs, activities or services.**

The large size of the LEP population in this region is expected to increase proportionately to the general population. Staff has been out in front of requests for Spanish language information with all advertisement and signage at it relates to marketing and citizen input. Spanish and/or other language interpreters or publications will be provided at all public meetings. Language assistance will be provided using the City of Raleigh's language line serving 128 different languages. The probability is very likely that the members in the RTA service area will have future contact with LEP individuals is projected to increase in the future.

The Capital Area MPO conducts Technical Coordinating Committee (TCC) and Transportation Advisory Committee (TAC) meetings throughout the year. The Capital Area MPO conducts open house public input workshops to receive input for regarding the regions prioritization list or for other projects, as they may occur. Community outreach is achieved through the Capital Area MPO's website, in-person office visits to MPO staff, and through advertising in the local newspaper.

### **3. The nature and importance of programs, activities or services provided by RTA to the LEP population.**

A variety of programs will use federal funds to plan for future transportation projects, and therefore will include the possibility of direct service or programs that requires vital, immediate or emergency assistance, such as medical treatment or services for basic needs (like food or shelter).

Involvement by citizens is vital and it is our mission to touch all segments of the community. We will ensure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved in the transportation planning process to be consistent with the goal of the Federal Environmental Justice program and policy.

The impact of proposed transportation investments on underserved and underrepresented population groups is part of the evaluation process for the use of federal funds in three (3) major work products for the MPO (each of the following bullet points represents a document created by the MPO):

- The **Unified Planning Work Program (UPWP)**, a one or two-year business plan.
- The **Transportation Improvement Program (TIP)**, a 7-year staged program of funded projects for all modes of travel. The TIP is based on and reflects the North Carolina Department of Transportation's Work Program.
- The **Long Range Transportation Plan, (LRTP)**, a 20-year (or more) forecast of multi-modal transportation needs.

The TIP document is developed by NCDOT. As such, any Spanish version of that document provided to our governing body by NCDOT will be made available on the Capital Area MPO's website. Inclusive public participation is a priority consideration in other regional plans, studies and programs as well. The impacts of transportation improvements resulting from these planning activities have an impact on all residents. Understanding and continued involvement are encouraged throughout the process. The Raleigh Transit Authority is very concerned with input from all stakeholders, and every effort is taken to make the planning process as inclusive as possible. As a result of the long range transportation planning process, selected projects receive approval for federal funding and progress towards project planning and construction under the responsibility of local jurisdictions or state transportation agencies. These state and local organizations have their own policies to ensure LEP individuals can participate in the process that shapes where, how and when a specific transportation project is implemented. Services provided by The City of Raleigh that are most likely to encounter LEP individuals are the fixed route [city bus] system which serves the general public and the ADA Para transit system which serves primarily senior and disabled persons.

#### **4. The resources available to RTA and overall cost to provide LEP assistance.**

The RTA assessed its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that the RTA could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered.

The Raleigh Transit Authority seeks input from all stakeholders, and every effort is made to ensure that the planning process is as inclusive as possible. Continued public involvement and participation is encouraged throughout the process. Given the size of the LEP population within the Raleigh planning area transportation plan documents, agenda packages, programs, and maps are included to show the area of our outreach. Documents are translated to customers to ensure LEP individuals can participate in the process that shapes where, how and when a specific transportation project is implemented.

The Raleigh Transit Authority will continue to include the LEP community and is committed to including all residents in the transportation planning and decision-making process. The RTA will continue its efforts to collaborate with state and local agencies to provide language translation and interpretation services when practical and in consideration of the funding available. When applicable, the translation of these documents will begin after the final English version has been completed. Spanish language outreach materials from organizations such as federal, state, and local transportation agencies will be used when possible.

Based on the four-factor analysis, the RTA developed its LEP Plan as outlined in the following section.

### **Limited English Proficiency [LEP] Plan Outline**

How the City of Raleigh staff may identify an LEP person who needs language assistance:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- When the City of Raleigh sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
- Have *Language Identification Placards* available at City of Raleigh events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist the sponsoring agency in identifying language assistance needs for future events.
- Have *Language Identification Placards* on all transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to try to obtain contact information to give to the transit system manager for follow-up. Dispatchers and schedulers will also be instructed to obtain contact information from LEP individuals they encounter, either in person or over the phone.
- *Language Identification Placards* will be available at the Moore Square Bus Station and at the main office reception desk. It will be especially important for the agent to have these cards available since the station serves both the local transit system and national intercity bus carriers.
- Vehicle operators and other front-line staff, like dispatchers, ADA schedulers, and service development planners, will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year. The survey will be conducted once each year.

## **Language Assistance Measures**

There is a percentage in Wake County counties of LEP individuals, that is, persons who speak English “not well” or “not at all”, the RTA will ensure that the following measures are in place:

- *Language Identification Placards* will be available at all times in the transit vehicles, at the Moore Square Bus Station, and at transit system administrative offices where tickets are sold or information is distributed.

When the City of Raleigh website was redesigned, a feature will be added to allow an LEP person to contact staff via email indicating his/her native language and the type of assistance needed.

The RTA Title VI Policy and Limited English Proficiency Plan will be posted on the agency website, [www.raleighnc.gov](http://www.raleighnc.gov).

When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance services at the City’s Language line service.

## **Staff Training**

The following training will be provided to City’s Transit staff:

- Information on the RTA Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the *Language Identification Placards*
- Documentation of language assistance requests.
- Use of the City’s Language line service.
- How to handle a potential Title VI/LEP complaint.

## **Outreach Techniques:**

Translation resources are available in this region.

When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

Bus schedules maps, and other transit publications will be made available in an alternative language when and if a specific and concentrated LEP population is identified.

Translation resources are available in this region.

### **Monitoring and Updating the LEP Plan**

The City of Raleigh will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data from current and future U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the City's service area.

Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether transit system's financial resources are sufficient to fund language assistance resources needed.
- Determine whether the City of Raleigh have fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

### **Dissemination of the City's Transit Program LEP Plan**

A link to the City's LEP Plan and the Title VI Plan will be included on the City of Raleigh website, [www.raleighnc.gov](http://www.raleighnc.gov). Any person or agency with internet access will be able to access and download the plan from the City of Raleigh website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which the City of Raleigh will provide, if feasible.

All Title VI complaints and/or concerns will be handled by the City's Citizen Complaints Administrator to monitor the receiving, processing, and resolution of all complaints and to independently investigate complaints as deemed necessary and appropriate by the City's Administrator for resolution.

Ms. Sharon Banks is the City's Complaint Administrator:

Sharon Banks, City's Complaint Administrator  
Community Relations Administrator  
City Manager Department  
222 West Hargett Street, Room 228  
Raleigh, NC 27601  
[919] 996-4648

The City's Complaint Administrator will be responsible for analyzing and investigating all problems submitted by citizens. All individuals submitting a Title VI Complaint will be contacted by the City's Complaint Administrator within twenty-four(24) hours. The City's Complaint Administrator will seek resolution of complaints within ten (10) working days where possible. A maximum of an additional ten (10) working days will be allotted for resolution, for a total of twenty (20) days.

All citizens submitting a citizen complaint form will receive a feedback response.

Questions or comments regarding the LEP Plan may be submitted to the City of Raleigh Senior Transit Planner as follows:

Richard Vinson  
City of Raleigh Transit Program  
C/o Senior Transit Planner  
P.O. Box 590  
Raleigh, NC 27602  
Phone: [919] 996-4087  
Fax: [919] 996-7639  
Email: [art@raleighnc.gov](mailto:art@raleighnc.gov)