TITLE VI PROGRAM

NORTH CENTRAL WISCONSIN REGIONAL PLANNING COMMISSION
(NCWRPC)

Title VI Plan Elements

The NCWRPC’s Title VI plan includes the following elements:

1. Policy Statement (and Evidence of Approval)
2. Notice to the Public
3. Complaint Procedure
4. Complaint Form
5. List of transit related Title VI Investigations, Complaints and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan
8. Minority Representation Table and Description
9. RPC Demographic Data, Analysis and Procedures

1. POLICY STATEMENT

The NCWRPC, as a subrecipient of Federal grant dollars through the Wisconsin Department of Transportation (WisDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Adopted on: July 30, 2014

________________________________________________________
Adopted by: North Central Wisconsin Regional Planning Commission

This policy is hereby adopted (see Appendix) and signed by:

NCWRPC

Executive Name/Title: Robert Lussow, Chair

Executive Signature: [Signature]
2. TITLE VI NOTICE TO THE PUBLIC

The NCWRPC’s Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI  
Qhia lub Public ntawm Txaj Cai Nyob rau hauv Title VI  
Notificación al Público de los Derechos Bajo el Título VI

NCWRPC

The NCWRPC operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the NCWRPC.

El NCWRPC opera sus programas y servicios sin tener en cuenta raza, color y origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles. Cualquier persona que cree que él o ella ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante la NCWRPC.

Lub NCWRPC muaj nws cov kev pab thiab cov kev pab cuam uas tsis muaj hais txog haiv neeg, tsos nqaij daim tawv, thiab lub teh chaws nyob rau hauv raws li Title VI ntawm Civil Rights Act. Txhua tus neeg uas ntseeg hais tias nws los yog nws tau raug los ntawm tej yam tsis raug cai aggrieved ciav-cais xyaum raws li Title VI yuav ua ntawv tsis txaus siab nrog lub NCWRPC.

For more information on the NCWRPC’s civil rights program, and the procedures to file a complaint, contact 715-849-5510; email staff@ncwrpc.org; or visit our office at 210 McClellan Street, Wausau, WI 54403. For more information, visit [www.ncwrpc.org](http://www.ncwrpc.org).

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, contact 715-849-5510.  
Yog hais tias cov lus qhia uas yuav tsum tau nyob rau hauv lwm hom lus, hu rau 715-849-5510  
Si se necesita información en otro idioma de contacto, 715-849-5510.

The NCWRPC’s Notice to the Public is posted in the following locations:

✓ Agency website [www.ncwrpc.org]  
✓ Public areas of the agency office

NCWRPC Title VI Plan

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3. TITLE VI COMPLAINT PROCEDURES

The NCWRPC’s Title VI Complaint Procedure is made available in the following locations:

- Agency website [www.ncwrpc.org]
- Hard copy in the central office
- Available in appropriate languages for LEP populations meeting the threshold, upon request

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the NCWRPC may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form (see page 4).

The NCWRPC investigates complaints received no more than 180 days after the alleged incident. The NCWRPC will only process complaints that are complete.

Once the complaint is received, the NCWRPC will review it to determine if its office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the office.

The NCWRPC has 90 days or until its next scheduled Executive Committee meeting, whichever is later, to investigate the complaint. If more information is needed to resolve the case, the NCWRPC may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the Commission can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 10 days after the date of the letter or the LOF to do so. A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact 715-849-5510.
Yog hais tias cov lus qhia uas yuav tsum tau nyob rau hauv lwm hom lus, ces hu rau 715-849-5510.
Si se necesita informacion en otro idioma de contacto, 715-849-5510.
4. **TITLE VI COMPLAINT FORM**

The NCWRPC’s Title VI Complaint Procedure is made available in the following locations:

- Agency website [www.ncwrpc.org]
- Hard copy in the central office
- Available in appropriate languages for LEP populations meeting the threshold, upon request

---

| Section I: |
| Name: |
| Address: |
| Telephone (Home): | Telephone (Work): |
| Electronic Mail Address: |
| Accessible Format Requirements? | Large Print | Audio Tape |
| | TDD | Other |

| Section II: |
| Are you filing this complaint on your own behalf? Yes* No |
| *If you answered "yes" to this question, go to Section III. |
| If not, please supply the name and relationship of the person for whom you are complaining: |
| Please explain why you have filed for a third party: |
| Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party: Yes No |

| Section III: |
| I believe the discrimination I experienced was based on (check all that apply): |
| [ ] Race [ ] Color [ ] National Origin |
| Date of Alleged Discrimination (Month, Day, Year): |
| Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. |

| Section IV: |
| Have you previously filed a Title VI complaint with this agency? Yes No |
Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

[ ] Yes  [ ] No

If yes, check all that apply:

[ ] Federal Agency: _____________________________
[ ] Federal Court _____________________________  [ ] State Agency ________________
[ ] State Court _____________________________  [ ] Local Agency ________________

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI:

Name of agency complaint is against:

Contact person:

Title:

Telephone number:

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

Signature and date required below

_________________________________  _____________________
Signature                                      Date

Please submit this form in person at the address below, or mail this form to:

NCWRPC Title VI Coordinator
210 McClellan Street, Ste 210
Wausau, WI  54403
5. LIST OF TITLE VI INVESTIGATIONS/COMPLAINTS/LAWSUITS

Check One:

X There have been no investigations, complaint and/or lawsuits filed during the report period.

There have been investigations, complaints and/or lawsuits filed. See list below.

<table>
<thead>
<tr>
<th></th>
<th>Date (Month, Day, Year)</th>
<th>Summary (include basis of complaint: race, color, or national origin)</th>
<th>Status</th>
<th>Action(s) Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Complaints</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lawsuits</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
6. PUBLIC PARTICIPATION PLAN

Strategies and Desired Outcomes

To promote inclusive public participation, the NCWRPC will use its resources available to employ the following strategies, as appropriate:

✓ Provide for early, frequent and continuous engagement by the public.
✓ Expand traditional outreach methods.
✓ Select accessible and varied meeting locations and times
✓ Employ different meeting sizes and formats
✓ Use social media in addition to other resources as a way to gain public involvement
✓ Use newspaper ads in publications that serve LEP populations.
PLN SUMMARY

This Limited English Proficiency Plan has been prepared to address NCWRPC’s responsibilities as a subrecipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166 titled, Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person’s inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective subrecipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

NCWRPC has developed its Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined by 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, NCWRPC used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the North Central Region who may be served by the NCWRPC.

2. The frequency with which LEP persons come in contact with NCWRPC programs or services.

3. The nature and importance of programs or services provided by NCWRPC to the LEP population.

4. The interpretation services available to NCWRPC and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require NCWRPC services.

The NCWRPC staff obtained data from the 2008-2012 American Community Survey 5-year estimates for Language Spoken At Home and found that 7,941 persons over the age of five in the Region speak English less than “very well” or are “limited English proficient.” This equates to
1.9% of the Region's population. The most prevalent languages of those who are limited English proficient are Hmong with 2,706 persons and Spanish/Spanish Creole with 2,526 persons.

As such, Hmong and Spanish/Spanish Creole are the only two language groups that reach the "Safe Harbor" threshold within the Region. The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that "speaks English less then very well" by the total population of the Region. The LEP Safe Harbor Threshold provision is 5% or 1,000 individuals, whichever is less. The NCWRPC Title VI public notice includes text in both Hmong and Spanish.

2. The frequency with which LEP persons come in contact with NCWRPC services or programs.

NCWRPC staff reviewed the frequency with which it’s Policy Board, staff, and contractors have, or could have, contact with LEP persons. To date, the NCWRPC has had no requests for interpreters and no requests for translated program documents. The NCWRPC Policy Board, NCWRPC staff, and NCWRPC contractors have had very little contact with LEP persons.

3. The nature and importance of services and programs provided by NCWRPC to the LEP population.

The overwhelming majority of the population 5 years and over in the Region, 94.3%, speaks only English. As a result, the only social services or professional and leadership organization in the Region that focus on outreach to LEP individuals is the Hmong Association. The Policy Board, NCWRPC staff, and NCWRPC contractors are most likely to contact LEP individuals through public meetings and other general public involvement opportunities.

4. The resources available to NCWRPC to provide LEP assistance.

NCWRPC has reviewed its available resources that could be used for providing LEP assistance. The resources include access to Hmong language assistance through the Hmong Association and access to additional interpretive services through each County as well as online translation applications.

**LANGUAGE ASSISTANCE**

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to NCWRPC’s programs and services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How NCWRPC staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services, in appropriate languages for LEP populations meeting the "Safe Harbor" threshold, upon request.
• NCWRPC staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
• A staff person may 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. Although translation may not be able to be provided at the event it will help identify the need for future events.

Language Assistance Measures
Although there is a low percentage in the North Central Region of LEP individuals, that is, persons who speak English “less than very well,” NCWRPC will strive to offer the following measures:

1. The NCWRPC staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.

2. When and if the need arises for LEP outreach related to NCWRPC’s programs and services, it will coordinate with the municipalities in the NCWRPC Planning Area to determine an appropriate course of action in regard to existing interpretive and outreach resources available.

STAFF TRAINING

The following training will be provided to all NCWRPC staff:

• Information on the Title VI Policy and LEP responsibilities.
• Description of language assistance services offered to the public.
• Documentation of language assistance requests.
• How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for NCWRPC will be required to follow the Title VI/LEP guidelines.

TRANSLATION OF DOCUMENTS

NCWRPC weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, NCWRPC will consider the translation of documents (or portions thereof) on a case by case basis, as requested.

MONITORING

NCWRPC will review the LEP Plan as required by WisDOT. Such review and update (if appropriate) may include the following:

• The number of documented LEP person contacts encountered.
• How the needs of LEP persons have been addressed.
• Determination of the current LEP population in the service area.
• Determination 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 NCWRPC’s financial resources are sufficient to fund language assistance resources needed.
• Determine whether NCWRPC fully complies 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.

NOTICE OF NCWRPC’S LEP PLAN

The NCWRPC will provide notice of the LEP Plan by:

• Posting notice of the LEP Plan in public areas the NCWRPC’s office notifying LEP persons of the LEP Plan and how to access language services.
• Posting the LEP Plan on the NCWRPC website.
8. MINORITY REPRESENTATION INFORMATION

A. Minority Representation Table

Title 49 CFR Section 21.5(b)(1)(vii) states that a subrecipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.” Subrecipients that have transit-related, nonelected planning boards, advisory councils or committees, or similar decision-making bodies must provide a table depicting the racial breakdown of the membership of those bodies, and a description of efforts made to encourage the participation of minorities on such decision-making bodies.

The NCWRPC Policy Board or Commission is the sole decision-making body of the NCWRPC. The Commission is comprised of representatives appointed by each member county and the Governor of the State of Wisconsin, as such, minority representation is beyond the control of the NCWRPC. Table1 depicts the composition of the NCWRPC’s Policy Board.

<table>
<thead>
<tr>
<th>Body</th>
<th>Caucasian</th>
<th>Hispanic</th>
<th>African American</th>
<th>Asian American</th>
<th>Native American</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>91.3%</td>
<td>1.8%</td>
<td>1%</td>
<td>1.3%</td>
<td>3.2%</td>
</tr>
<tr>
<td>Policy Board</td>
<td>96%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>4%</td>
</tr>
<tr>
<td>Executive Committee</td>
<td>100%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

B. Efforts to Encourage Minority Participation

The NCWRPC understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, the NCWRPC encourages participation of all its citizens. As vacancies on boards, committees and councils become available, the NCWRPC will make efforts to encourage and promote diversity. To encourage participation on its boards, committees and councils, the NCWRPC will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, the NCWRPC will use creative ways to make participating realistic and reasonable, such as scheduling meetings at times best suited to its members.
9. RPC DEMOGRAPHIC DATA, ANALYSIS AND PROCEDURES

In addition to the base Title VI items 1-8 (The NCWRPC is not a provider of fixed route public transportation.), the following additional elements are required for transportation planning organizations like the NCWRPC:

a. A demographic profile of the planning area that includes identification of the locations of minority populations: see Table 2 on page 15.

b. A description of the procedures by which the needs of minority populations are identified and considered within the planning process.

When and if the need arises for LEP outreach related to NCWRPC’s programs and services, it will coordinate with the municipalities in the NCWRPC Planning Area to determine an appropriate course of action in regard to existing interpretive and outreach resources available.

c. Demographic maps that overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds for transportation purposes, including Federal funds managed by the RPC: see Map 1 on page 16.

Table 3 illustrates distribution of federal and state funds for transportation related planning projects.

<table>
<thead>
<tr>
<th>Project</th>
<th>Federal</th>
<th>State</th>
<th>Total</th>
<th>Service Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rural Transportation Planning Grant</td>
<td>$63,502</td>
<td>$7,937.50</td>
<td>$71,439.50</td>
<td>Entire Region - 10 County Area</td>
</tr>
<tr>
<td></td>
<td>89%</td>
<td>11%</td>
<td>100%</td>
<td></td>
</tr>
</tbody>
</table>

d. Analysis of the impacts identified in (c) that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.

Taken as a whole, the transportation planning services provided by the NCWRPC do not pose disproportionate or adverse impacts on minority populations. The benefits of the
transportation services provided are reasonably distributed across the entire North Central Region to serve the needs of all populations in the area.

The NCWRPC is not a direct recipient required to submit additional information to FTA per Chapter VI-1 of FTA Circular 4702.1B (October 1, 2012).
<table>
<thead>
<tr>
<th>COUNTY</th>
<th>POPULATION (2012 ACS ESTIMATE)</th>
<th>NON-HISPANIC WHITE</th>
<th>HISPANIC WHITE</th>
<th>AFRICAN AMERICAN</th>
<th>AMERICAN INDIAN / ALASKAN NATIVE</th>
<th>ASIAN</th>
<th>NATIVE HAWAIIAN / PACIFIC ISLANDER</th>
<th>TWO OR MORE RACES</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADAMS</td>
<td>20,530</td>
<td>90.7</td>
<td>3.2</td>
<td>3.3</td>
<td>1.1</td>
<td>0.4</td>
<td>0.1</td>
<td>1.2</td>
</tr>
<tr>
<td>FOREST</td>
<td>9,198</td>
<td>81.4</td>
<td>0.9</td>
<td>1.0</td>
<td>13.8</td>
<td>0.2</td>
<td>0.1</td>
<td>2.6</td>
</tr>
<tr>
<td>JUNEAU</td>
<td>26,751</td>
<td>92.3</td>
<td>2.3</td>
<td>2.2</td>
<td>1.6</td>
<td>0.5</td>
<td>0.1</td>
<td>1.0</td>
</tr>
<tr>
<td>LANGLADE</td>
<td>19,714</td>
<td>95.0</td>
<td>1.5</td>
<td>0.5</td>
<td>1.3</td>
<td>0.4</td>
<td>0.0</td>
<td>1.3</td>
</tr>
<tr>
<td>LINCOLN</td>
<td>28,515</td>
<td>96.5</td>
<td>1.1</td>
<td>0.6</td>
<td>0.4</td>
<td>0.5</td>
<td>0.0</td>
<td>0.9</td>
</tr>
<tr>
<td>MARATHON</td>
<td>134,681</td>
<td>89.9</td>
<td>2.1</td>
<td>0.7</td>
<td>0.5</td>
<td>5.6</td>
<td>0.0</td>
<td>1.2</td>
</tr>
<tr>
<td>ONEIDA</td>
<td>35,715</td>
<td>95.7</td>
<td>1.0</td>
<td>0.5</td>
<td>1.0</td>
<td>0.5</td>
<td>0.0</td>
<td>1.3</td>
</tr>
<tr>
<td>PORTAGE</td>
<td>70,308</td>
<td>92.3</td>
<td>2.6</td>
<td>0.7</td>
<td>0.4</td>
<td>2.8</td>
<td>0.0</td>
<td>1.2</td>
</tr>
<tr>
<td>VILAS</td>
<td>21,302</td>
<td>86.3</td>
<td>0.8</td>
<td>0.3</td>
<td>11.0</td>
<td>0.3</td>
<td>0.1</td>
<td>1.2</td>
</tr>
<tr>
<td>WOOD</td>
<td>74,357</td>
<td>93.5</td>
<td>2.1</td>
<td>0.7</td>
<td>0.9</td>
<td>1.9</td>
<td>0.0</td>
<td>0.9</td>
</tr>
<tr>
<td>NC REGION</td>
<td>441,071</td>
<td>91.3</td>
<td>1.8</td>
<td>1.0</td>
<td>3.2</td>
<td>1.3</td>
<td>0.1</td>
<td>1.3</td>
</tr>
</tbody>
</table>

Source: US Census Bureau County Quick Facts - 2012 ACS Data.
Map 1
Minority Population Percentage
In North Central Region

Legend
Percent Minority*

- 0.4% - 4.5%
- 4.6% - 10.5%
- 10.6% - 20.8%
- 20.9% - 42.4%
- 42.5% - 97.6%

*Data Compiled by Block Group
Source: Census 2010
APPENDIX
RESOLUTION ADOPTING NCWRPC TITLE IV PLAN
NORTH CENTRAL WISCONSIN REGIONAL PLANNING COMMISSION
RESOLUTION 2014-6

ADOPTING TITLE VI PROGRAM

WHEREAS, the United States Department of Transportation regulations require the NCWRPC to establish and maintain a Title VI Program to carry out U.S. Department of Transportation Title VI regulations (49 CFR part 21) and to integrate into its programs and activities considerations expressed in the Department’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons (70 FR 74087, December 14, 2005); and

WHEREAS, the NCWRPC intends that no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any NCWRPC program or activity, regardless of funding source;

NOW, THEREFORE, BE IT RESOLVED: That the NCWRPC approves the NCWRPC Title VI Program as being consistent with regional plans and policies.

Adopted this 30th day of July 2014.

Certified:

Robert Lussow, Chairperson

George Bornemann, Secretary/Treasurer