# County of Lee Transit System

# Title VI Plan

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# Title VI Plan

Revised:
April 20, 2015

By: Lee County Board of Commissioners

Amy M Dalrymple

Amy M. Dalrymple - Chair

Attest:

Gaynell M. Lee

Gaynell M. Lee, Clerk to the Board

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# Section 1: Overview

## I. Introduction and Purpose

The County of Lee divides this plan into two parts with the inclusion of a Limited English Proficiency Plan (LEP): Title VI (Environmental Justice) and the Public Involvement Process. Although they are separate, Environmental Justice and Public Involvement compliment one another in ensuring fair and equitable distribution of transportation services and facilities. Public participation is essential to the success of any public planning program or project. Without the involvement of local citizens, it is difficult to design a program that meets the needs of the public or to measure the project's success. Effective public involvement not only provides transportation officials with new ideas, but it also alerts them to potential environmental justice concerns during the planning stage of a project. Perhaps the most important element of public participation is to create a sense of ownership among the people, especially those who are often at the mercy of their surroundings.

These reasons, combined with a national history of discrimination against persons on the basis of race, color, ethnic origin, age, sex, disability, religion and economic status, has led federal and state governments to set requirements to ensure equity of public involvement in federally funded agencies and their associated organizations. It is through the details of these individual programs that the equity and democracy that we embrace in this country is exercised.

**Objectives**

1. Comply with the public involvement and environmental justice requirements of the Federal and State regulations. The County of Lee is a recipient of Federal Financial Assistance for transit operations under the County of Lee Transit System.
2. 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.
3. Provide specific opportunities for local citizens and citizen-based organizations to discuss their views and provide input on the subject areas addressed in plans, projects or policies of.
4. Ensure full and fair participation by all potentially affected communities in the transportation decision-making process.
5. Inform and educate citizens and other interested parties about ongoing County of Lee Transit System planning activities, and their potential role in those activities.

## II. Title VI

### Responsibilities and Objectives

The principle of environmental justice in transportation planning ensures that transportation projects do not have a disproportionately negative impact on minority and low-income populations. The goal is to achieve environmental justice protection for all communities. For transportation, Title VI means assessing the nature, extent, and incidence of probable impacts, both negative and positive, from any transportation-related activity on minority, low-income and other disadvantaged populations.

## Legislation and Guidance

**Title VI of the Civil Rights Act of 1964** created a foundation for future environmental justice regulations. Since the establishment of Title VI, environmental justice has been considered in local, state, and federal transportation projects. Section 42.104 of Title VI and related statutes including Circular 4702.1B and 4703.1A describe the contents of Title VI Compliance that require Federal agencies to ensure that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving Federal financial assistance on the basis of race, color, national origin, age, sex, disability, or religion.

**The National Environmental Policy Act of 1969** (NEPA) addresses both social and economic impacts of environmental justice. NEPA stresses the importance of providing for "all Americans safe, healthful, productive, and aesthetically pleasing surroundings", and provides a requirement for taking a "systematic, interdisciplinary approach" to aid in considering environmental and community factors in decision making.

**The Civil Rights Restoration Act of 1987** further expanded Title VI to include all programs and activities of Federal aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

**Executive Order 12898, issued in 1994**: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. This piece of legislation directed every Federal agency to make Environmental Justice part of its mission by identifying and addressing all programs, policies, and activities that affect human health or the environment so as to identify and avoid disproportionately high and adverse effects on minority populations and low-income populations. Rather than being reactive, Federal, State, local and tribal agencies must be proactive when it comes to determining better methods to serve the public who rely on transportation systems and services to increase their quality of life.

In April 1997, as a reinforcement to **Executive Order 12898**, the United States Department of Transportation (DOT) issued an **Order on Environmental Justice (DOT Order 5610.2),** which summarized and expanded upon the requirements of **Executive Order 12898** to include all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), or other U.S. DOT components.

In December 1998, the FHWA issued the **FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (DOT Order 6640.23)** which mandated the FHWA and all its subsidiaries to implement the principles of **Executive Order 12898** and **U.S. DOT Order 5610.2** into all of its programs, policies, and activities.

On October 7, 1999, the FHWA and the FTA issued a memorandum **Implementing Title VI Requirements in Metropolitan and Statewide Planning**. This memorandum provides clarification for field offices on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was for planning officials to understand that environmental justice is equally as important during the planning stages as it is during the project development stages.

## Methodology

### Identification of Target Populations (Demographics) & Spatial Concentrations of Targeted Populations

The geographic basis for Title VI analysis is based on U.S. 2000 Census data. For purposes of Title VI analysis, it is desirable to make the analysis on the smallest geographic unit available for which information is obtainable for all relevant groups.

The County of Lee Transit System has identified seven relevant groups for Title VI analysis as described below.

. Low-income;
. Federal Assistance Recipients;
. Minority;
. Elderly;
. Low literacy/English proficiency or English spoken as a second language;
. Disabled populations; and
. Zero car households.

Following the identification of the relevant groups for analysis, the next step undertaken was to identify the general distribution of each Title VI population group throughout the Lee County's Area Transit System service region and then define where each group is most concentrated.

# Section 2: Policy Statement

**County of Lee Transit System**

**Title VI Policy Statement**

It is the policy of The County of Lee Transit System (COLTS) to provide equal opportunity to all people who are admitted to, participate in, or are the recipients of COLTS services.

**Procedures:**

As a recipient of Federal financial assistance, COLTS does not exclude, deny benefits to, or otherwise discriminate against any person on the grounds of race, color, religion, sex, national origin, or on the basis of disability or age in admission to, participation in, or receipt of the services and benefits of any of its programs and activities or in employment carried out by COLTS.

This statement is in accordance with the provisions of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Americans with Disabilities Act of 1990, and Regulations of the U.S. Department of Health and Human Services issued pursuant to the acts, Title 45 Code of Federal Regulations Part 80, 84, and 91. (Other Federal Laws and Regulations provide similar protection against discrimination on grounds of sex and creed.)

Questions concerning this policy, or in the event of a desire to file a complaint alleging violations of the above, please contact The County of Lee Transit System at 919-776-7201 and speak with the Director.

*Complaints must be filed in writing or in person no later than 180 days after the alleged act of discrimination occurred to, 1615 S Third Street Sanford, NC 27330

Deborah P. Dandra

Title VI Coordinator

County of Lee Transit System

Adopted:
April 6, 2015

Amy N Dalrymple

Chair, Lee County Board of Commissioners

## Section 3: Public Involvement Plan

The County of Lee Transit System (COLTS) will coordinate with individuals, institutions, and/or organizations to reach out to members in the Lee County area especially the minority/low-income communities where there resides more mobility impaired citizens needing the COLTS services. We will provide opportunities for public participation through means other than written communication.

To promote inclusive public participation, the County of Lee Transit System will use its resources available to employ the following strategies, as appropriate:

- Provide for early, frequent and continuous engagement by the public
- Timely public notification
- 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 radio, television or newspaper ads on stations and in publications that serve LEP populations.
- Early and continuing involvement in the development of transportation plans and programs.

**Public Meetings:**

- All Public meetings will be held in convenient and accessible locations and facilities
- Meeting material will be available in a variety of formats upon previous request.
- A variety of advertising means will be used to inform the media of public meetings.
- Assistance to persons with disabilities will be available upon previous request.

**Notice to the Public**

The County of Lee Transit System provides notice to the public of our Title VI obligations on brochures, which are disseminated to the public throughout our service area. Notice is also available through the Lee County Government Web-site (www.leecountync.gov/colts).

**Public Involvement Process**

The main objectives are to:

1. Comply with the public involvement and environmental justice requirements of the Federal and State regulations, and provide specific opportunities for local citizens and citizen-based organizations to discuss their views and provide input on the subject areas addressed in plans, projects or policies of the County of Lee Transit System, and
2. Inform and educate citizens and other interested parties about ongoing County of Lee Transit System planning activities, and their potential role in those activities.
3. Work with other local and state organizations that have similar goals and requirements.
4. Study other transit organizations that have been successful in Public Participation Efforts.

Experience has shown difficulty in reaching a large span of the population and keeping them involved. Federal and State regulations require us to provide the public with information and to

reach out and include traditionally under-served populations. This document has been prepared to serve that purpose.

## Outreach Tools

### A. General Public Relations

General public relations may be defined as any action that might reach any citizen, whether or not that citizen has specific interest or knowledge regarding transportation planning. This group of techniques includes the followings: announcements targeted at newspapers and radio; posters or pamphlets displayed in public places; and signs posted near future or current transportation project sites. Meetings or hearings that are held in public places and covered by the media can act as general public relations.

These techniques are ways to keep the general public aware of the presence of the planning organization and the status of specific projects so that they may develop an interest and choose to become better informed or actively involved.

### B. Events

Lee County has sought a variety of ways to educate and engage the public. In general, the earlier public involvement is sought, the better. It is also an improved use of citizens' free time to participate in a process that will determine the direction of a project that may take years to complete. To minimize citizen's frustration when they are invited to join late in the process - when the values and goals may have already been decided the following tools are arranged from most participatory to least. Annual focus group sessions open to the general public are held with the Lee County Transportation Advisory Board to seek input on current services and service needs. All meetings of the Lee County Board of Commissioners are open to the general public with a public comment and concern agenda items. Citizens are allowed up to three minutes to express their concern.

**Special Events** are held to bring attention to a specific activity or issue. Special events may take the form of a fair or special educational lecture with civic groups or other public entities. Special events are a way to expose a large number of people to a project or program. Focus groups work well for public input. Annually the County of Lee Transit System participates in but not limited to: The Boomer, Senior and Caregiver Expo, COTY and other industrial health fairs as invited, Faith Community and Civic presentations to include Kiwanis and Lions Club, Central Carolina and Lee County Public Schools career fair, Community Night Out events, Lee County Alzheimer's Walk and Conference, Lee County and City of Sanford Health Fairs.

**Surveys** are an efficient method of gathering input from a large number of people at an early stage of the planning process. This is particularly useful when trying to understand the goals and aspirations of a community before attempting to address any specific problems. As an outreach tool, surveys are a good way to identify citizens who may want to become further involved. Surveys may be administered in person or on the phone or distributed via mail, on the Internet, or at public places. A labor intensive activity, implementation of survey might be aided by volunteers and student interns. COLTS staff provide an annual survey of passengers.

**Public Hearings** are held for COLTS when a grant application is being submitted, change in rates, or a specific plan that warrants public review before official submission. As with all of these tools, care must be taken to ensure that the public is made fully aware of the event well in advance, and that the goals and values of the plan are clearly stated. These are advertised as listed above in section A.

**Community Forum Meetings** are held to discuss programs and activities within communities, and the public is engaged to discuss their needs in general. COLTS staff participate as requested at local forums, most often to those organizations of the physically and mentally challenged adults who need mobility services. LEP guidelines are followed as needed.

**C. Direct Marketing and Education**

Direct marketing and education is meant to reach out and provide specific information to specific parties. For example, landowners or leaders of an ethnic community may be sought out and personally invited to come to a meeting. Similarly, lower income groups may be specifically targeted to be educated about their rights, or children or families may be targeted to begin a discussion on a specific program. Direct marketing and education may take place through direct mass mailings, radio, and press advertising, social media or through meetings with specific groups of individuals such as local clubs, homeless people, property owners, disabled individuals or housing authorities. It can also be through making direct phone calls or meeting with key people who desire to participate in a given process. This is the most labor intensive and potentially most fruitful way to create a diverse and active public participation process.

**Plan Monitoring and Evaluation**

Evaluation of the success of any public involvement efforts must be result-oriented. It is never safe to assume that just because people don't come to an event that they are uninterested in the project. The goal is to educate and include the public at all levels of planning, not just to invite them. Evaluation, then, must be two-fold. The first part is to track what efforts are being made, and the results of those efforts, and the second part is to make regular assessments of the success of a technique within a given program, and to strategize for future successes. Interaction and evaluation with the Lee County Transportation Advisory Board, survey results, and local business and organizations can assist in this assessment.

**Tracking Efforts and Success**

In order to track our public participation efforts, it is necessary that the individuals involved record their efforts.

1. The County of Lee Transit System will keep a log of their outreach activities.
2. Copies should be kept of any print ads, and transcripts of any public service announcements.
3. Notes should be made after the meeting regarding the overall tone of the meeting and any ideas or observations made regarding the process.

# Section 4: LEP Plan

## County of Lee Transit System

## TITLE VI Limited English Proficiency Policy

**Title**: Title VI of the Civil Rights Act of 1964; Policy on the Prohibition against National Origin Discrimination as it Affects Persons with Limited English Proficiency

**Authority**: Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et. seq.

**Section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S.C. Section 2000d *et. seq.* states: "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."**

**Regulations implementing Title VI provided in part at 45 C.F.R. Section 80.3 (b):**
**"(1) A recipient under any program to which this part applies, may not, directly or through contractual or other arrangements, on ground of race, or color, or national origin:**
- **(i) Deny an individual any service, financial aid, or other benefit provided under the program;**
- **(ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others in the program;**

**(2) A recipient, in determining the types of services, financial aid, or other benefits, or facilities which will be provided under any such program or the class of individuals to whom, or the situations in which such services, financial aid or other benefits, or facilities will be provided... *may not directly, or through contractual or other arrangements, utilize 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 accomplishments of the objectives of the program with respect to individuals of a particular race, color, or national origin."***

### Purpose

The purpose of this Policy is to ensure compliance with Title VI of the Civil Rights Act of 1964, and other applicable federal and state laws and their implementing regulations with respect to persons with limited English proficiency (LEP). Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the ground of race, color or national origin by any entity receiving federal financial assistance. Administrative methods or procedures, which have the effect of subjecting individuals to discrimination or defeating the objectives of these regulations, are prohibited.

In order to avoid discrimination on the grounds of national origin, all programs or activities administered by The County of Lee Transit System (COLTS) must take adequate steps to ensure that their policies and procedures do not deny or have the effect of denying LEP individuals with equal access to benefits and services for which such persons qualify. This Policy defines the responsibilities COLTS has to ensure LEP individuals can communicate effectively.

## Plan Components

As a recipient of federal funds, the County of Lee Transit System (COLTS) is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

**Limited English Proficient (LEP):** Refers to persons for who English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, or not at all.

The County of Lee Transit System's Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis,* including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance LEP persons
6. Additional deemed necessary.

## Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, COLTS conducted a *Four Factor Analysis*[i] of the following areas: 1) Demography, 2 Frequency, 3) Importance and 4) Resources and Costs.

LEP *Four Factor Analysis*

- Factor 1: **Demography**: What is the number of or proportion of LEP persons served and the languages spoken in the service area? This first factor requires COLTS to review its US Census Data to determine if it meets *the LEP Safe Harbor Threshold.*

  COLTS studied the US Census Bureau's 2011-2013 three year American Community Survey estimates in order to determine the number of limited English proficient individuals living within the COLTS service area. The Census Bureau 2011-2013 Demographic Profile Data estimates that Lee County has a population of 59,471 people, with Hispanics and/or Latino individuals comprising the largest non-English speaking language group. The language spoken most often by this group is Spanish. The Census Bureau estimates that there are approximately 11,418 (19.2%) Spanish speaking individuals living in Lee County. However, it is estimated that of the 8,623 over the age of five, forty percent speak English very well leaving 5,173 who do not speak English well.

- Factor 2: **Frequency**: How often does the staff come into contact with LEP Persons?

COLTS assessed the frequency at which the staff comes into contact with LEP individuals. This included documenting phone inquiries and talking with Lee County Department of Social Services, Lee County Public Health Department and Central Carolina Community College. COLTS has not received requests for an interpreter by phone or requests for translation services in the past six months. COLTS staff are in contact daily with LEP individuals; however, the inquirer has their own interpreter or speaks English enough to schedule their trip. To verify that COLTS is meeting the needs of the non-English speaking population, surveys will be conducted via:

- Public Meetings
- Ridership
- Contractors
- Local Agencies
- Faith Community

Questions include:

What means of Transportation do you often use?

- COLTs
- Taxi
- Car Pool
- Personal Vehicle

How often do you use this service?

- Daily
- Weekly
- Week-ends only

- Factor 3: **Importance**: How does the program, service or activity affect people's lives?

Lee County is in the center of North Carolina. COLTS recognizes that public outreach to all groups within the community is important and will continue to reach out to persons with limited English proficiencies. COLTS primary service to all citizens including LEP clients is scheduling transit services for general public ridership or those sponsored through agency contracts with the Department of Social Services, Central Carolina Community College, Lee County Senior Services and other human service agencies within Lee County. Mobility for all citizens in Lee County is the primary mission of the transit system to access medical, employment, education and human service organizations to better the lives of those living in Lee County. COLTS offers Subscription, Demand Response and Deviated Fixed Route operations to all Lee County residents.

Other means of public transportation are limited in Lee County. The local Cab Company does not have ADA assessable vehicles and maybe cost prohibited to most mobility impaired citizens.

Survey:

Is COLTS important to you?
- Yes
- No

If so, which service?
- Public Access – Retail
- Medical
- Employment
- Education
- Social
- Recreation
- Other
  Please list:

- Factor 4: **Resources and Costs:** What funding and other resources are available for LEP outreach?

  COLTS identified local resources that could be used to provide LEP assistance to customers. This included identifying bi-lingual COLTS staff, volunteers in the Senior Services Department that manages the COLTS operation, Latino/Hispanic staff working in Lee County Government with offices adjacent to COLTS and free language services such as google translator which could be used to provide translation and interpreting services. Google translation is installed on the COLTS web-site. If a professional paid language service is needed, funding will be evaluated and requested to be paid from the County of Lee.

**Analysis**

COLTS analyzed the four factors and determined that the population of LEP persons living in Lee County that speak Spanish warrants the need for special population outreach to assist individuals with Limited English Proficiency within its service region. The Spanish speaking population meets the safe harbor threshold for the need of translation services listed above. There is not another LEP population in Lee County that meets the threshold.

**Language Assistance Measures**

When an interpreter is needed, in person or on the telephone, first determine what language is required. COLTS Staff have access to Spanish interpreting services through Hispanic and Latino staff within Lee County Government if there is not a COLTS bi-lingual staff member available. If the interpreting of staff is not sufficient or a more formal interpretation is required, staff will seek other options such as paid interpreting services.

**COLTS Staff Training**

All staff will be provided with the LEP Plan and will be educated on procedures and services available. This information will also be part of the training provided to Office Staff personnel. Training topics are listed below:

- Understanding the Title VI LEP responsibilities
- What language assistance services are offered by COLTS
- How to use interpretation and translation services
- Documentation of language requests
- I Speak Language Identification Guide available in COLTS offices

When anyone seeks services from COLTS, staff inquires about what language is their preference and whether they desire an interpreter if preference is other than English.

**Providing Notice of Available Language Service to LEP Persons**

The COLTS website http://leecountync.gov/Departments/Colts.aspx has google language attached; and if the user needs translation to Spanish, he/she can click on the drop down box and click "Spanish" and the information will be translated in Spanish. Brochures for COLTS services are printed in English and Spanish. Public hearing notices are printed in Spanish and advertised in the Local Newspaper and in public locations along with the English version.

**Outreach Techniques**

Presentations made to the public from a COLTS Staff member that could be beneficial to a LEP person or if Staff is hosting a meeting or workshop in a geographic location with a known concentration of LEP persons, they will have meeting notices, fliers, advertisements, and agendas printed in an alternative language, such as Spanish. Also, an interpreter will be available for translating.

**Monitoring and Updated the LEP Plan**

On at least an annual basis, COLTS with the assistance of the Lee County Transportation Advisory Board will conduct an evaluation of the LEP plan to determine overall effectiveness. The evaluation will consider which aspects of the program are effective and which aspects need adjustments.

COLTS annual review of the LEP plan will consist of the following activities:

- Assessment of number of persons with limited English proficiency living within COLTS targeted service area.
- Assessment of the current language needs clients with limited English proficiency to determine whether they need an interpreter and/or translated materials to communicate effectively with staff.
- Determine if existing language assistance services are meeting the needs of clients with limited English proficiency.
- Assess whether staff members understand the County of Lee Transit System LEP policies and procedures, how to carry them out and whether language assistance resources and arrangements for resources are still current and accessible.

**LEP Contact**

Any questions or comments regarding this plan should be directed to the individual listed below:

Mailing Address:

Deborah Davidson
The Enrichment Center of Lee County

Contact Information

Deborah Davidson
Phone: 919-776-0501 Ext. 2216

1615 S Third Street
Sanford, NC 27330

Fax: 919-774-7593

ddavidson@leecountync.gov

## Section 5: The County of Lee Transit System's Title VI Notice to the Public of Protection under Title VI & Notice of Complaint Procedure

U.S. Department of Justice regulations, 28 Code of the Federal Regulations, Section 42.405, Public Dissemination of Title VI Information, requires recipients of Federal financial assistance to publish or broadcast program information in the news media. Advertisements must state that the program is an equal opportunity program and/or indicate that Federal law prohibits discrimination. Additionally reasonable steps shall be taken to publish information in languages understood by the population eligible to be served or likely to be directly affected by transportation projects.

The County of Lee Transit System hereby gives notice that it is the policy of the Department to assure full compliance with the Title VI Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 *Federal Actions to Address Environmental Justice in Minority Populations and Low- Income Populations,* Executive Order 13166 *Improving Access to Services for Persons with Limited English Proficiency*, and related nondiscrimination statues and regulations in all programs and services. It is the Department's policy that no person in the United States shall, on the grounds of race, color, sex, age, income status, national origin, or disabilities be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program, activities, or services for which the County of Lee Transit System receives Federal financial assistance.

Any person who believes they have been mistreated by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the County of Lee Transit System, NCDOT, FTA, FHWA, USDOT, USDOJ.

***Any such complaint must be in writing or in person with the County of Lee Transit System Office, 1615 S Third Street, Sanford, NC 27330 within one hundred eighty (180) days following the date of the alleged discrimination occurrence. Title VI Discrimination Complaint forms may be obtained from the County of Lee Transit System office at no cost by calling 919-776-7201.**

**Office of Equal Opportunity and Workforce Service**
**North Carolina Department of Transportation, Office of Equal Opportunity and Workforce Services, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or toll free 800-522-0453**

**Federal Transit Administration, Office of Civil Rights, ATTN: Title VI Program Coordinator, East Bldg. 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590**

# Section 6: Processing Procedures for Complaints of Discrimination

## COUNTY OF LEE TRANSIT SYSTEM
## EXTERNAL DISCRIMINATION COMPLAINT PROCEDURES

These external discrimination complaint procedures apply to County of Lee Transit System, COLTS, and cover complaints filed under Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities applicable to programs, services, or activities carried out by COLTS or its agents.

COLTS will make every effort to obtain early resolution of complaints at the lowest level possible. Complaints of alleged discrimination will be investigated by the appropriate authority. The option of informal mediation between the affected parties and COLTS staff may be utilized for resolution. Upon completion of each investigation, COLTS staff will inform every complainant of all avenues of appeal.

### PURPOSE

The purpose of these discrimination complaint procedures is to describe the process used by for processing and investigating alleged complaints of discrimination.

### FILING OF COMPLAINTS

1. **Applicability** – The complaint procedures apply to the beneficiaries of the COLTS programs, activities, and services, including the public and any consultants/contractors hired by COLTS.
2. **Eligibility** – Any person or class of persons who believes that he/she has been subjected to discrimination or retaliation prohibited by any of the Civil Rights authorities, based upon race, color, sex, age, national origin, or disability may file a written complaint with COLTS. The law prohibits intimidation or retaliation of any sort. The complaint may be filed by the affected individual or a representative and must be in writing.
3. **Time Limits and Filing Options** – A complaint must be filed no later than 180 calendar days after the following:
   - The date of the alleged act of discrimination; or
   - 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 that conduct was discontinued or the latest instance of the conduct.

Complaints may be submitted to the following entities:

- **The County of Lee Transit System, Director – 919-776-0501 or 1615 S Third Street, Sanford NC 27330.Organization Name and Contact Information**
- **North Carolina Department of Transportation**, Office of Equal Opportunity and Workforce Services, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or toll free 800-522-0453
- **US Department of Transportation**, Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202-366-4070

  **Federal Highway Administration**, Office of Civil Rights, 1200 New Jersey Avenue, SE, 8th Floor, E81-314, Washington, DC 20590, 202-366-0693 / 366-0752

  **Federal Highway Administration**, North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010

  **Federal Transit Administration**, Office of Civil Rights, ATTN: Title VI Program Coordinator, East Bldg, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590

  **Federal Aviation Administration**, Office of Civil Rights, 800 Independence Avenue, SW, Washington, DC 20591, 202-267-3258
- **US Department of Justice**, Special Litigation Section, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, DC 20530, 202-514-6255 or toll free 877-218-5228

4. **Format for Complaints –** Complaints shall be in **writing** and **signed** by the complainant(s) or a representative and include the complainant's name, address, and telephone number. Complaints received by fax or e-mail will be acknowledged and processed. Allegations received by telephone or in person will be reduced to writing, may be recorded and will be provided to the complainant for confirmation or revision before processing. Complaints will be accepted in other languages including Braille.

5. **Complaint Basis –** Allegations must be based on issues involving race, color, national origin, sex, age, or disability. The term "basis" refers to the complainant's membership in a protected group category.

| Protected Categories | Definition | Examples | Applicable Statutes and Regulations | |
|---|---|---|---|---|
| | | | FHWA | FTA |
| Race | An individual belonging to one of the accepted racial groups; or the perception, based usually on physical characteristics that a person is a member of a racial group | Black/African American, Hispanic/Latino, Asian, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, White | Title VI of the Civil Rights Act of 1964; 49 CFR Part 21; 23 CFR 200 | Title VI of the Civil Rights Act of 1964; 49 CFR Part 21; Circular 4702.1B |
| Color | Color of skin, including shade of skin within a racial group | Black, White, brown, yellow, etc. | | |
| National Origin | Place of birth. Citizenship is not a factor. Discrimination based on language or a person's accent is also covered. | Mexican, Cuban, Japanese, Vietnamese, Chinese | | |
| Sex | Gender | Women and Men | 1973 Federal-Aid Highway Act | Title IX of the Education Amendments of 1972 |
| Age | Persons of any age | 21 year old person | Age Discrimination Act of 1975 | |
| Disability | Physical or mental impairment, permanent or temporary, or perceived. | Blind, alcoholic, para-amputee, epileptic, diabetic, arthritic | Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990 | |

Complaint Processing

1. When a complaint is received by COLTS, a written acknowledgment and a Consent Release form will be mailed to the complainant within ten (10) business days by registered mail.
2. COLTS will consult with the NCDOT External Civil Rights Section to determine the acceptability and jurisdiction of the complaint. *Note: If NCDOT has jurisdiction, the External Civil Rights Section will be responsible for the remainder of this process. COLTS will record the transfer of responsibility in its complaints log.*
3. Additional information will be requested if the complaint is incomplete. The complainant will be provided 15 business days to submit any requested information and the signed Consent Release form. Failure to do so may be considered good cause for a determination of no investigative merit.
4. Upon receipt of the requested information and determination of jurisdiction COLTS will notify the complainant and respondent of whether the complaint has sufficient merit to warrant investigation.
5. If the complaint is investigated, the notification shall state the grounds of the COLTS jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
6. If the complaint does not warrant investigation, the notification to the complainant shall specifically state the reason for the decision.

Complaint Log

1. When a complaint is received by COLTS, the complaint will be entered into the Discrimination Complaints Log with other pertinent information, and assigned a **Case Number.** *Note: All complaints must be logged.*
2. The complaints log will be submitted to the NCDOT's Civil Rights office during Title VI compliance reviews. *Note: NCDOT may also be request the complaints log during pre-grant approval processes.*
3. The **Log Year(s)** since the last submittal will be entered (e.g., 2012-2015, 2014-2015, FFY 2015, or 2015) and the complaints log will be signed before submitting the log to NCDOT.
4. When reporting **no complaints**, check the **No Complaints or Lawsuits** box and sign the log.

# COUNTY OF LEE TRANSIT SYSTEM

# DISCRIMINATION COMPLAINT FORM

**Any person who believes that he/she has been subjected to discrimination based upon race, color, sex, age, national origin, or disability may file a written complaint with COLTS, within 180 days after the discrimination occurred.**

| Last Name: | First Name: | ☐ Male ☐ Female |
|---|---|---|

| Mailing Address: | City | State | Zip |
|---|---|---|---|

| Home Telephone: | Work Telephone: | E-mail Address |
|---|---|---|

Identify the Category of Discrimination:

☐ RACE ☐ COLOR ☐ NATIONAL ORIGIN ☐ AGE

☐ RELIGION ☐ DISABILITY ☐ SEX/GENDER

Identify the Race of the Complainant

☐ Black ☐ White ☐ Hispanic ☐ Asian American

☐ American Indian ☐ Alaskan Native ☐ Pacific Islander ☐ Other _____

Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.

Names of individuals responsible for the discriminatory action(s):

How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. **(Attach additional page(s), if necessary).**

The law prohibits intimidation or **retaliation** against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.

Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: (Attached additional page(s), if necessary).

| | Name | Address | Telephone |
|---|---|---|---|
| 1. | | | |
| 2. | | | |
| 3. | | | |
| 4. | | | |

DISCRIMINATION COMPLAINT FORM

Have you filed, or intend to file, a complaint regarding the matter raised with any of the following? If yes, please provide the filing dates. Check all that apply.

- ☐ NC Department of Transportation _____
- ☐ Federal Transit Administration _____
- ☐ Federal Highway Administration _____
- ☐ US Department of Transportation _____
- ☐ Federal or State Court _____
- ☐ Other _____

Have you discussed the complaint with any COLTS representative? If yes, provide the name, position, and date of discussion.

Please provide any additional information that you believe would assist with an investigation.

Briefly explain what remedy, or action, are you seeking for the alleged discrimination.

****WE CANNOT ACCEPT AN UNSIGNED COMPLAINT. PLEASE SIGN AND DATE THE COMPLAINT FORM BELOW.**

| _____ | _____ |
|---|---|
| **COMPLAINANT'S SIGNATURE** | **DATE** |

**MAIL COMPLAINT FORM TO:**

NORTH CAROLINA DEPARTMENT OF TRANSPORTATION
OFFICE OF EQUAL OPPORTUNITY & WORKFORCE SERVICES
EXTERNAL SERVICES SECTION
1511 MAIL SERVICE CENTER
RALEIGH, NC 27699-1511
919-508-1808 or 800-522-0453

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: ☐NCDOT ☐FTA Date Referred: _____

## DISCRIMINATION COMPLAINTS LOG

Log Year(s):

| CASE NO. | COMPLAINANT NAME | RACE/ GENDER | RESPONDENT NAME | BASIS | DATE FILED | DATE RECEIVED | ACTION TAKEN | DATE INVESTIG. COMPLETED | DISPOSITION |
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**No Complaints or Lawsuits** ☐

I certify that to the best of my knowledge, the above described complaints or lawsuits alleging discrimination, or **no complaints or lawsuits** alleging discrimination, have been filed with or against **Official Organization Name** since the previous Title VI Program submission to NCDOT.

_____ _____

**Signature of Title VI Coordinator or Other Authorized Official** **Date**

_____

**Print Name and Title of Authorized Official**

# Lee County Complaint Log

| Case No. | Complainant | Respondent | Receiving Agency | Date Filed | Basis | Date of Report | Determination |
|---|---|---|---|---|---|---|---|
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# *County of Lee Transit System*

***1615 S. Third Street***
***Sanford, NC 27330***

## Discrimination Complaint Form

| Last Name: | First Name: | ☐ Male<br>☐ Female |
|---|---|---|

| Mailing Address: | City: | State: | Zip: |
|---|---|---|---|

| Home Telephone:<br>( ) | Work Telephone:<br>( ) | E-mail Address: |
|---|---|---|

Identify the Category of Discrimination:

☐ RACE ☐ COLOR ☐ NATIONAL ORIGIN ☐ AGE
☐ RELIGION ☐ DISABILITY ☐ SEX/GENDER ☐ INCOME STATUS

Identify the Race of the Complainant

☐ Black ☐ White ☐ Hispanic ☐ Asian American
☐ American Indian ☐ Alaskan Native ☐ Pacific Islander ☐ Other _____

Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.

How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional page(s), if necessary)

The law prohibits intimidation or retaliation against anyone because he/she has either taken action, or participated in action to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.

Names of individuals responsible for the discriminatory action(s):

Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: (Attach additional page(s), if necessary)

| Name | Address | Telephone |
|---|---|---|
| 1. | | |
| 2. | | |
| 3. | | |
| 4. | | |

## Discrimination Complaint Form
**Page 2**

Have you filed, or intend to file, a complaint regarding the matter raised with any of the following? If yes, please provide the filing dates. Check all that apply.

- ☐ US Equal Employment Opportunity Commission Date:
- ☐ Federal Highway Administration Date:
- ☐ US Department of Transportation Date:
- ☐ Federal or State Court Date:
- ☐ Other Date:

Have you discussed the complaint with any NCDOT representative? If yes, provide the name, position, and date of discussion.

Please provide any additional information that you believe would assist with an investigation.

Briefly explain what remedy, or action, you are seeking for the alleged discrimination.

****WE CANNOT ACCEPT AN UNSIGNED COMPLAINT. PLEASE SIGN AND DATE THE COMPLAINT FORM BELOW.**

| _____ | _____ |
|---|---|
| **COMPLAINANT'S SIGNATURE** | **DATE** |

## MAIL COMPLAINT FORM TO:

County of Lee Transit System

**Mailing:**
1615 S. Third Street
Sanford, NC 27330

**Location:**
1615 S. Third Street
Sanford, NC 27330

FOR MORE INFORMATION VISIT THE WEB SITE:
www.ncdot.gov/business/ocr
or call
919-508-1808 or 800-522-0453

## FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: ☐FHWA ☐FTA ☐FAA ☐USDOT ☐DOJ Date Referred: _____

# Section 7: Standard DOT Title VI Assurances Section

## U.S. DOT TITLE VI ASSURANCES

The County of Lee (hereinafter referred to as the "Recipient") HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent 'directives, 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 otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a)(1) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its County of Lee Transit System:

1. That the Recipient agrees that each "program" and each "facility as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.

2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all County of Lee Transit System and, in adapted form in all proposals for negotiated agreements:

   > The County of Lee, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office the Secretary, Part 21, Nondiscrimination in Federally assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contact entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

3. That the Recipient shall insert the clauses of Appendix A of this assurance in every contract subject to the Act and the Regulations.

4. That the Recipient shall insert the clauses of Appendix B of this assurance, 'as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.

5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.

6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.

7. That the Recipient shall include the appropriate clauses set forth in Appendix C of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under the County of Lee Transit Program; and (b) for the construction or use of or access to space on, over or under real property acquired, or improved under the County of Lee TransitProgram.

8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.

9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.

10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the County of Lee Transit System and is binding on it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest and other participants in the County of Lee Transit System. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient/

Dated November 3, 2014 County of Lee (Name of Recipient)

by Charles T. Parks

Charles T. Parks, Chairman

Kerry A. Schmid

Kerry A. Schmid, County Attorney

Attachments:
Appendices A, B, C

# 5311 Transit Advisory Board (TAB) Composition

**Service Area Demographics**

| Elderly | Minority | Disabled | Low Income | Hispanic or Latino |
|---|---|---|---|---|
| 19% | 33% | 19% | 9% | 18% |

**Applicant:** Lee County

**Number of Projected TAB Meetings for FY2015:** 4

**Number of TAB Meetings held in FY2014 as of:** 10/24/2014 | 2

*2000 Census data used for Disabled Calculations*
*2005-2009 ACS Estimates used for Elderly & Low Income Calculations*
*2010 Census data used for Minority & Origin Calculations*

| | TAB Member's Name | What best describes the role or position of this board member in the community? *Select only **one** description per board member* | | | | | This person knows the transportation needs of this group or groups. *Check as many as apply* | | | | | | Board Service *Current Term Status* | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Human Service or Non-Profit Agency | Transportation Provider | Business | Gvmt or Gvmt Affiliate | Transit User | General Public | Elderly | Disabled | Minority or Hispanic | Limited English | Low Income | Year Term Began | Year Term Ends | Appointed or Selected | # Years Served |
| 1 | Bob Joyce | | | Chamber of Comm | Economic Dev. Office | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | S | 6 |
| 2 | Evangeline Smith | | | | College/University | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | S | 1 |
| 3 | Jan Hayes | Other | | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | S | 6 |
| 4 | Josepheus Thompson | | | | Employment Security | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | S | 3 |
| 5 | Terrell Jones | Other | | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | S | 3 |
| 6 | Rev. Caleb Valalobos | Other | | | | | | | | ✓ | ✓ | ✓ | | | S | 4 |
| 7 | Robert Reives | | | | Elected Official | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | 2013 | 2014 | A | 24 |
| 8 | Lesa Price | DSS | | | | | ✓ | ✓ | ✓ | ✓ | | | | | S | 5 |
| 9 | Lyn Hankins | Smart Start | | | | | ✓ | | ✓ | ✓ | ✓ | ✓ | | | S | 9 |
| 10 | John Crumpton | | | | Government Staff | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | S | 6 |
| 11 | Debbie Davidson | Senior Services | | | | | ✓ | ✓ | ✓ | | | ✓ | | | S | 24 |
| 12 | Sid Morgan | | Other | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | S | 4 |
| 13 | Angelina Noel | DSS | | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | S | 4 |
| 14 | David Montgomery | | | | MPO Rep | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | S | 1 |
| 15 | Lois Fleming | | Private Provider | | | | ✓ | | | | | | | | S | 10 |
| 16 | Kay Courtier | | | Dialysis Ctr Staff | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | S | 1 |
| 17 | Robert McCarthy | | | | | HS Agency Passenger | ✓ | ✓ | ✓ | | | | 2013 | 2015 | A | 10 |
| 18 | William Dugan | | | | | HS Agency Passenger | ✓ | ✓ | ✓ | | | | 2013 | 2015 | A | 1 |
| 19 | Rockie Dillon | Vocational Rehab | | | | | | ✓ | ✓ | | | ✓ | | | S | 24 |
| 20 | Meg Moss | Sheltered Workshop | | | | | | ✓ | ✓ | | | ✓ | | | S | 8 |

# 5311 Transit Advisory Board (TAB) Composition

**Service Area Demographics**

| Elderly | Minority | Disabled | Low Income | Hispanic or Latino |
|---|---|---|---|---|
| 17% | 30% | 19% | 13% | 12% |

**Applicant:** Lee County

**Number of Projected TAB Meetings for FY2015:** 4

**Number of TAB Meetings held in FY2014 as of:** 10/24/2013 | 2

*2000 Census data used for Disabled Calculations*
*2005-2009 ACS Estimates used for Elderly & Low Income Calculations*
*2010 Census data used for Minority & Origin Calculations*

| | TAB Member's Name | What best describes the role or position of this board member in the community? *Select only **one** description per board member* | | | | | This person knows the transportation needs of this group or groups. *Check as many as apply* | | | | | | Board Service *Current Term Status* | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Human Service or Non-Profit Agency | Transportation Provider | Business | Gvmt or Gvmt Affiliate | Transit User | General Public | Elderly | Disabled | Minority or Hispanic | Limited English | Low Income | Year Term Began | Year Term Ends | Appointed or Selected | # Years Served |
| 1 | Michael Spirico | | Ambulance Service | | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | | S | 2 |
| 2 | Michael Roberson | | | | | Disabled Passenger | ✓ | ✓ | ✓ | | | | | | S | 4 |
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