

Race and Equity Pocket Questions

Title and purpose of this initiative: Title VI Plan. The Title VI Plan aims to ensure that no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program, service, or activity administered or funded by the Town of Carrboro on the basis of race, color, national origin, limited English proficiency, sex, gender identity or expression, sexual orientation, age, disability, familial status, pregnancy, income level, National Guard or veteran status, or religion, as provided by Title VI of the Civil Rights Act of 1964 and other federal nondiscrimination authorities. By adopting a Title VI Plan, the Town of Carrboro is showing compliance towards federal funding requirements.

Department: Planning

What are the racial and equity impacts?

The Title VI Plan applies to all Town of Carrboro residents, but specifically focuses on ensuring nondiscrimination for the following federally protected classes: race, color, national origin, limited English proficiency, sex, gender identity or expression, sexual orientation, age, disability, familial status, pregnancy, income level, National Guard or veteran status, and religion. Community members who believe they have been discriminated against through a program, service, or activity administered or funded by the Town of Carrboro now have a structured complaint process at the local level. Moreover, the Title VI Plan requires that the Town actively work to mitigate disparate impacts through its programs, services, and activities, reemphasizing our race and equity commitments.

Who is or will experience community burden?

The Title VI Plan provides a structured complaint process to resolve nondiscrimination complaints. Complainants coming forward may experience emotional burden from revisiting their experiences and other lingering impacts of local and systemic discrimination.

Who is or will experience community benefit?

Every resident of the Town of Carrboro has the potential to benefit from the adoption of a Title VI Plan, but specifically those recognized as part of a federally protected class. The Title VI Plan aims specifically to ensure environmental justice and equitable public involvement so that disparate impacts are not experienced among communities of color, low-income populations, and other underrepresented groups.

What are the root causes of inequity?

The root causes of disparities in the United States include residential segregation (discriminatory lending practices, racial covenants, single-family zoning), racial wealth/wage gap (slavery, immigration, Jim Crow era policies), gentrification, inequitable federal infrastructure investment (urban renewal, highway construction), and overall environmental racism and structural racism. These disparities exist due to a combination of intentional and unintentional acts by government entities.

What might be the unintended consequences of this action or strategy?

1. An unstated goal of the Title VI Plan may be to increase trust in government. There may be questions or concerns about why the Town is only now adopting a plan.
2. The Title VI Plan aims to ensure nondiscrimination for all federally protected classes. Federal protections under Title VI for certain classes such as familial status, gender identity or expression, National guard or veteran status, pregnancy, sexual orientation, and religion are limited to discrimination cases involving employment, fair housing, or specific transportation matters. The different protections related to certain classes may be confusing and present difficulties to individuals trying to understand their legal right to complain and how to pursue a complaint.
3. It is a goal of the Title VI Plan to improve community relations. There is a potential to also increase tensions with communities who have a history of discriminatory government interaction and wish for this plan to provide protections that exceed the federal requirements.
4. Increased awareness of rights under Title VI may result in a rise in complaints and legal actions, which can require additional resources of time and funding to address.
5. Town of Carrboro subrecipients/contractors are also subject to Title VI. The associated requirements may strain the capacity, and/or strain relationships with subrecipients/contractors who may feel overly scrutinized or burdened by compliance demands.

How is your department planning to mitigate any burdens, inequities, and unintended consequences?

The department is planning to mitigate burdens, inequities and unintended consequences as follows:

1. The Title VI Plan provides contextual information as to why the Town is moving forward with adopting a plan at this time. By coupling the adoption with an information campaign, residents should understand the Town's commitment to ensuring residents know their rights.
2. The Title VI Plan's complaint process, while legal in nature, attempts to be accessible and acknowledge the limitations of and the pathways to accessing these federal protections. Successful implementation will emphasize the Title VI Coordinator's comfortability with the process and capacity to address questions. There is also an opportunity to provide greater clarity through the informational campaign.
3. The Town of Carrboro is committed to acknowledging the role that government has historically played in discrimination and working to resolve these matters. The Title VI Plan emphasizes throughout that the Town of Carrboro wishes to be proactive in ensuring antidiscrimination. More specifically, it includes in its implementation plan that Town Staff will explore how to support community members whose complaints fall outside the scope of Title VI and/or Carrboro's jurisdiction.
4. The goal of the Title VI complaint process is to resolve complaints at the lowest level possible and not escalate the situation to the point where legal representation is required.

That said, the Town Attorney may play a role in investigations or providing guidance to the Title VI Coordinator.

5. The Title VI Plan requires contractors and subrecipients to state that they are aware of Title VI requirements and include clauses in subgrants that acknowledge this. Future Town of Carrboro contracts will have a specific section that details this information. Although there may be some administrative burden associated with adjusting subgrant contracts, these are expected to be minimal and also to have the potential to reduce other legal consequences.