

# **TOWN OF SPENCER**

## **TITLE VI NONDISCRIMINATION IMPLEMENTATION PLAN & POLICY**

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**TOWN OF SPENCER, INDIANA**  
**TITLE VI NONDISCRIMINATION PLAN & POLICY**

**POLICY STATEMENT**

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial Assistance” (42 U.S.C. Section 2000d).

Pursuant to Title VI of the Civil Rights Act of 1964, as amended, and the Civil Rights Restoration Act of 1987, Town of Spencer, Indiana, hereinafter referred to as “Town of Spencer,” will not exclude from participation in, deny the benefits of, or subject to discrimination any individual on the grounds of race, color, or national origin, sex, age, disability, limited English proficiency and income status.

The Spencer Town Board has prepared a statement of nondiscrimination and its intent to comply and enforce Title VI of the Civil Rights Act of 1964 that statement is posted in all public buildings owned and operated by Town of Spencer. Additionally, the posting provides information about how to raise concerns or lodge complaints related to potential violations of Title VI. A copy of this statement is also provided in this plan (**Appendix I**).

**TITLE VI COORDINATOR**

The Spencer Town Board has appointed a Title VI Coordinator. This position is reappointed annually at the first Town Board meeting in January of each year.

The current Title VI Coordinator is:

**Jon Stantz**  
Town of Spencer  
90 N West Street  
Spencer, Indiana 47460  
Phone (812)236-9097  
Email: [jon@pellroofing.com](mailto:jon@pellroofing.com)

The Town of Spencer Title VI Coordinator will:

- Administer and implement Town of Spencer's Title VI plan and policy.
- Develop and maintain a Title VI liaison team (**Appendix D**) to ensure departments are implementing, monitoring and complying with Town of Spencer's Title VI plan and policy.
- Conduct Title VI yearly reviews with liaisons in an effort to assist with identifying, addressing and eliminating discrimination concerns in every department.
- Conduct or facilitate Title VI training programs with departments and ensure policies are disseminated to employees.
- Work with liaisons to develop and disseminate Title VI information to contractors, subcontractors, vendors and consultants.
- Work with liaisons to ensure community involvement and outreach is in compliance with Title VI and provides equitable opportunities for participation.
- Ensure Title VI language is included in Town of Spencer contracts.
- Collect, review and preserve statistical data (race, color, national origin, language, gender, etc.) of participants in activities and programs to ensure Town of Spencer's continued compliance with Title VI.
- Collect, review and preserve data regarding the number of federally funded projects awarded or ongoing for the past three (3) years.
- Maintain all Title VI records and correspondence, including but not limited to, signed employee acknowledgements, complaints and all correspondence regarding such, requests for language services, demographic statistics, department compliance reviews and all Title VI federal agency correspondence and records.
- Address all Title VI discrimination complaints.
- Review and update the Title VI plan and policy as needed or required.
- Prepare and submit the annual Title VI update report.

### **EMPLOYER/EMPLOYEE DISSEMINATION & TRAINING**

Title VI plan and policy education and literature will be provided to all Town of Spencer employees. Town of Spencer employees will be required to sign an acknowledgement (**Appendix E**) of receipt indicating they have received and reviewed Title VI policy guidelines. New employees will be provided with education and literature at new employee orientation. Employees will be provided with updated education and literature as Town of Spencer deems necessary.

Employees will be expected to follow the Title VI policy and the guidelines set forth. In addition, Town of Spencer employees should make every effort to alleviate any barriers to service or public use that would restrict public access or usage, take prompt and reasonable action to avoid or minimize discrimination incidences and **immediately** notify the Title VI Coordinator, in writing, of any questions, complaints or allegations of discrimination.

## **CONTRACTORS, SUBCONTRACTORS, VENDORS & CONSULTANTS**

All contractors, subcontractors and vendors who receive payments from Town of Spencer where funding originates from any Federal assistance programs are subject to the provisions of Title VI of the Civil Rights Act of 1964, as amended. Town of Spencer will include Title VI language, as per the Standard U.S. DOT Title VI Assurances (**Appendices A, B, & C**), as relevant and appropriate, in written agreements and bid notices. Written agreements relevant to Title VI shall not contain any form of discrimination, either written or implied.

## **CONCERNS/COMPLAINT PROCESS**

Town of Spencer will take prompt and reasonable actions to thoroughly investigate concerns and complaints. Any individual, who believes they have been subjected to discrimination, may file a complaint with the Town of Spencer Title VI Coordinator. Complaint forms (**Appendix F**) can be found on Town of Spencer's website: [www.spencer.in.gov](http://www.spencer.in.gov) or by contacting the Town of Spencer Title VI Coordinator. In order for the complaint to be considered, the complainant must file the appropriate documentation:

1. Within 180 days of the alleged act of discrimination; or
2. Where there has been a continuing course of alleged discriminatory conduct, on the date in which the alleged conduct was discontinued.

Complaints shall be made in writing and shall be signed by the complainant and/or the complainant's representative. Complaints must contain the following and describe as completely as possible the facts and circumstances surrounding the alleged discrimination:

- Name of the complainant.
- Contact information (telephone number, address, email address).
- Basis for the allegation(s) (i.e., race, color, national origin, gender, age, etc.).
- A detailed description of the alleged discrimination (how, when, where & why they believe they were discriminated against including the location(s), name(s) and contact information of all witnesses, if applicable).
- Any other information that is deemed significant.

If the complainant is unable or incapable of providing a written statement, a verbal complaint may be made to the Town of Spencer Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the Town of Spencer Title VI Coordinator will assist the complainant in completing a written statement.

Within fifteen (15) calendar days after receipt of the complaint, the Title VI Coordinator will arrange to speak or meet with the complainant to discuss the complaint and the possible resolutions if applicable. If a complaint is deemed incomplete, additional information will be requested. The complainant has sixty (60) business days to respond to the request for additional information. A complainant's failure to respond to the request within sixty (60) business days may result in the administrative closure of the complaint.

If Town of Spencer does not have sufficient jurisdiction to investigate the complaint, the Title VI Coordinator will refer the complaint to the appropriate local, state or federal agency holding such jurisdiction. The Title VI Coordinator will notify the complainant or their representative, in writing, that the complaint is outside of Town of Spencer's jurisdiction and where the complaint has been referred for further handling.

The Title VI Coordinator will conduct a complete and thorough investigation of complaints inside Town of Spencer's jurisdiction and based upon the information obtained will render a final written response letter to the complainant or their representative by registered mail or hand delivery within sixty (60) business days. The final written response will include a description of the complaint, a summary of the investigation and the findings of such, summaries of all individuals interviewed, and if appropriate, recommendations and resolutions. All written complaints, investigations and responses will be retained by Town of Spencer for at least three (3) years.

A complainant's identity shall be kept confidential except to the extent necessary to complete the investigation. If it is necessary to disclose the complainant's identity to the alleged person who may have discriminated or a third-party, Town of Spencer must first obtain the complainant's written consent. Town of Spencer must also obtain the complainant's written consent before providing a copy of the complaint to any other individual(s) involved with the investigation.  
**(Appendix G)**

If a complainant is dissatisfied with the final resolution of the complaint, they have the right to file a complaint with:

Department of Justice  
**Federal Coordination and Compliance Section - NWB**  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W. Washington, D.C. 20530

## **PUBLIC DISSEMINATION**

Title VI information shall be displayed in Town of Spencer buildings and all places in which public meetings are held. The name and contact information of the Town of Spencer Title VI Coordinator will be displayed on the Title VI information (**Appendix I**).

The Town of Spencer Title VI plan and policy and complaint procedures are available on the Town of Spencer website at [www.spencer.in.gov](http://www.spencer.in.gov). Copies of the plan will be provided upon request.

Any questions or comments regarding this plan should be directed to the Title VI Coordinator.

## **COMMUNITY INVOLVEMENT & OUTREACH**

Town of Spencer is committed to ensuring that community involvement and outreach is done in a respectful and appropriate manner that will allow for diverse involvement. Public meetings, programs and activities will provide equitable opportunities for participation.

The Spencer Town Board meets regularly and those meetings are open to the public, as well as other various Town meetings. Meetings that are open to the public are advertised via local media and posted publicly in accordance with the Indiana Open Door Law.

Also published on the Town of Spencer website are various meeting agenda's, meeting minutes, Town of Spencer notices, events and news. Some departments within Town of Spencer utilize signage, media and social media websites as another avenue to communicate with the community.

## **DATA COLLECTION**

Pursuant to 23 CFR 200.9(b) (4), Town of Spencer shall collect and analyze statistical information regarding demographics to assist in monitoring and ensuring nondiscrimination in all of its programs and activities. The Town will utilize a voluntary Title VI public involvement survey (Appendix H) at all public hearings and meetings. The survey allows respondents to remain anonymous and requests information regarding the respondent's gender, ethnicity, race, age, income and if they are disabled. The facilitator of the public meetings will announce to attendees that the survey is available, explain its purpose, and remind attendees to complete the voluntary survey, if desired. Completed surveys will be retained by the Title VI Coordinator for three (3) years.

The Title VI Coordinator will also collect and report statistical data for the past three (3) years as it relates to the number of federally funded projects, complaints filed and the results of those complaints, any requests for language services, demographic statistics and department compliance reviews.

## **SECTION 504 /AMERICANS WITH DISABILITIES (ADA)**

Pursuant to the requirements of Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) as amended, and the Americans with Disabilities Act of 1990, as well as any other local, federal and state laws and regulations, Town of Spencer will make every reasonable effort to ensure that no individual with a disability will be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any of Town of Spencer's programs or activities.

Town of Spencer maintains a current ADA Transition Plan to insure citizens have access to and understand the Town's commitment to nondiscrimination on the basis of disability.

## **LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

Town of Spencer has prepared this plan in accordance with Title VI of the Civil Rights Act of 1964, as amended, which states that no person shall be subjected to discrimination on the basis of race, color or national origin. The purpose of this plan is to help identify reasonable steps for providing language assistance to individuals with limited English proficiency who wish to access services provided by Town of Spencer.

Presidential Executive Order No. 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that individuals treated differently based upon their inability to speak, read, write or understand English is a type of national origin discrimination. Presidential Executive Order 13166 defines limited English proficiency persons as those individuals who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

In order to prepare this plan, Town of Spencer utilized the U.S. Department of Transportation four- factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Town of Spencer program, activity or service.
2. The frequency with which LEP persons come in contact with Town of Spencer programs, activities or services.
3. The nature and importance of programs, activities or services provided by Town of Spencer to the LEP population.
4. The resources available to Town of Spencer and the overall costs to provide LEP assistance.



### **LEP ANALYSIS/OUTCOME AND PLAN:**

***FACTOR 1*** - The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Town of Spencer program, activity or service.

Using 2010 census data, it has been estimated that Town of Spencer's population was 2,217. The demographics by ethnicity indicate that 2170 citizens identified as non-Hispanic (97.9% of the total population).

Language Other than English:

Spanish: 5% of the population

Asian and Pacific Island language: 0% percent of the population

Other Indo-European language: 0% percent of the population

Other Language: 0% of the population.

Therefore, it is estimated that 95% of Town of Spencer's population speak only English.

***FACTOR 2*** - The frequency with which LEP persons come in contact with Town of Spencer programs, activities or services.

Town of Spencer is beginning a process to assess the frequency with which LEP individuals come in contact with any of our programs, activities or services. This will be accomplished by utilization of the Voluntary Title VI Public Involvement Survey (**Appendix H**), regularly questioning department heads and elected officials on their department's encounters with LEP individuals and asking that any requests for language assistance are reported to the Title VI Coordinator.

Based on the results of our research Town of Spencer will make a determination regarding the amount of contact with LEP individuals.

***FACTOR 3*** - The nature and importance of programs, activities or services provided by Town of Spencer to the LEP population.

The majority of federal funding dollars that are provided to Town of Spencer are applied to transportation-related needs. Some federal funding is received in the way of grants for programs for criminal offenders, adult protective services, emergency planning and other important programs that serve the entire Town population.

Relative to transportation, the Town of Spencer Street Department is responsible for all roads, bridges, and small structures within Town of Spencer which are not state highway.

Town of Spencer strives for safe and accessible roadways and continues to work to improve the transportation infrastructure for the citizens of Town of Spencer. Transportation in Town of Spencer is critical to the public as it provides access to emergency services (fire, police, etc.), health care, employment and other essential individual needs. If this information is not accessible to people with limited English proficiency, the consequences to the individuals relying on these services could be life-threatening.

*FACTOR 4* - The resources available to Town of Spencer and the overall costs to provide LEP assistance.

Because, in part, of the small portion of non-English speaking citizens in the Town, resources for multi-lingual interpreters are limited. Additionally, translation of signage and Town forms into various languages would be extremely costly when measured against the demonstrated need.

Due to the small portion of non-English-speaking citizens, the Town will continue to monitor the population growth and will make efforts to respond to the needs of non-English speaking citizens if such assistance is requested and is not deemed cost prohibitive; on a case-by-case basis.

The analyses of the four factors suggest that LEP services are not substantiated at Town of Spencer at this time. Town of Spencer, however, has committed to the following:

- Offer, wherever possible and not deemed financially prohibitive, translators for Town of Spencer public meetings, programs and activities if requested within forty-eight (48) hours in advance.
- Work with the local community college, Ivy Tech, to determine what resources they may have for language education and interpreters.
- Build a list of language assistance professionals and resources.
- In any programs or services where administrators see a need for dual language documents or personal assistance, departments are encouraged to use good judgment and work to accommodate citizens.
- Continually monitor our website and make adjustments as necessary to ensure information is accessible to LEP individuals when appropriate.

Town of Spencer is aware that the community profile is ever-changing; therefore, this LEP plan and the four-factor analysis will be re-evaluated on an annual basis to ensure that the plan remains reflective of the community's needs. Individuals requiring special language services or accommodations should contact Town of Spencer's Title VI Coordinator.

## **ENVIRONMENTAL JUSTICE**

Environmental Justice requires additional public participation and mitigation strategies when programs are in a disproportionately low income or minority area. Town of Spencer is committed to performing environmental justice analysis for any project that may result in a disproportionately high adverse impact on a minority or low-income population in or near the project area.

In performing such analysis, demographic data will be obtained and analyzed before and/or during the scoping stage of the project. The information obtained will be used in coordination planning and public involvement planning.

When the need for environmental justice analysis is appropriate, the Town will utilize the NEPA (National Environmental Policy Act) process and guidelines as defined on the NEPA website: [www.epa.gov/NEPA](http://www.epa.gov/NEPA)

## **APPENDIX "A"**

### **U.S. D.O.T TITLE VI ASSURANCES**

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

**(1) Compliance with Regulations:** The contractor shall comply with the Regulation relative to nondiscrimination in Federally-assisted programs of the Department of Transportation (hereinafter, "DOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

**(2) Nondiscrimination:** The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

**(3) Solicitations for Subcontractors, Including Procurements of Materials and Equipment:** In all solicitations either by competitive bidding or negotiation made by the contract or for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.

**(4) Information and Reports:** The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Town of Spencer or the Indiana Department of Transportation (INDOT) or the Federal Highway Administration (FHWA) to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall so certify to the Town of Spencer, or the Indiana Department of Transportation or the Federal Highway Administration as appropriate and shall set forth what efforts it has made to obtain the information.

**(5) Sanctions for Noncompliance:** In the event of the contractor's noncompliance with the nondiscrimination provisions of this contract, the Town of Spencer shall impose such contract sanctions as it or INDOT or FHWA may determine to be appropriate, including, but not limited to:

- a. withholding of payments to the contractor under the contract until the contractor complies, and/or
- b. cancellation, termination or suspension of the contract, in whole or in part.

**(6)**       Incorporation of Provisions: The contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto.

The contractor shall take such action with respect to any subcontractor procurement as the Town of Spencer or INDOT or FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance: Provided, however, that, in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request the Town of Spencer to enter into such litigation to protect the interests of the Town of Spencer, and , in addition , the contractor may request the United States to enter into such litigation to protect the interests of the United States.

## **APPENDIX "B"**

### **U.S. D.O.T TITLE VI ASSURANCES**

A. The following clauses shall be included in any and all deeds effecting or recording the transfer of real property, structures or improvements thereon, or interest therein from the United States.

#### *(GRANTING CLAUSE)*

NOW, THEREFORE, the Department of Transportation, as authorized by law, and upon the condition that the Town of Spencer will accept Title to the lands and maintain the project constructed thereon, in accordance with Title 23, United States Code of Federal Regulations the Regulations for the Administration of Federal Aid Transportation Program and the policies and procedures prescribed by INDOT or FHWA and, also in accordance with and in compliance with 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 (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Town of Spencer all the right, Title and interest of the Department of Transportation in and to said lands described in Exhibit "A" attached hereto and made a part hereof.

#### *(HABENDUM CLAUSE)*

TO HAVE AND TO HOLD said lands and interests therein unto Town of Spencer and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and shall be binding on the Town of Spencer, its successors and assigns.

The Town of Spencer, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) 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 with regard to any facility located wholly or in part on over or under such lands hereby conveyed [,] [and]\* (2) that the Town of Spencer shall use the lands and interests in lands and interests in lands so conveyed, in compliance with 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, and as said Regulations may be amended [,] and (3) that in the event of breach of any of the above-mentioned nondiscrimination conditions, the Department shall have a right to reenter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in and become the absolute

property of the Department of Transportation and its assigns as such interest existed prior to this instruction."

Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

## **APPENDIX "C"**

### **U.S. D.O.T TITLE VI ASSURANCES**

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the Town of Spencer pursuant to the provisions of Assurance 6(a).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that in the event facilities are constructed , maintained , or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation program or activity is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed 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, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.]

That in the event of breach of any of the above nondiscrimination covenants, Town of Spencer shall have the right to terminate the [license, lease, permit, etc.] and to re-enter and repossess said land and the facilities thereon, and hold the same as if said [licenses, lease, permit, etc.) had never been made or issued.

[Include in deed]

That in the event of breach of any of the above nondiscrimination covenants, Town of Spencer shall have the right to reenter said lands and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of Town of Spencer and its assigns.

The following shall be included in all deeds, licenses, leases, permits, or similar agreements entered into by Town of Spencer pursuant to the provisions of Assurance 6(b).

The (grantee, licensee, lessee, permittee , etc., as appropriate) for himself, his personal representatives , successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds, and leases add "as a covenant running with the land") that (1) no person on the ground of race, color. or national origin shall be excluded from participation in, denied the benefits of, or he otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over or under such land and the furnishing of services thereon, no person on the ground of, race, color, or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to



discrimination, (3) that the (grantee, licensee, lessee , permittee, etc.) shall use the premises in compliance with all other 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), and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.]\*

Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

That in the event of breach of any of the above nondiscrimination covenants, Town of Spencer shall have the right to terminate the [license, lease, permit, etc.] and to reenter and repossess said land and the facilities thereon, and hold the same as if said [license, lease, permit, etc.] had never been made or issued.

[Include in deeds]

That in the event of breach of any of the above nondiscrimination covenants, Town of Spencer shall have the right to reenter said land and facilities there-on, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of Town of Spencer and its assigns.

## **APPENDIX “D”**

### **TITLE VI LIAISON TEAM**

The Title VI Liaison Team shall consist of the following:

1. Title VI Coordinator appointed by the Spencer Town Board
2. Spencer Town Clerk-Treasurer
3. Department heads from the Sewer Department, Street Department, and Police Department.
4. A member of the Parks and Recreation
5. A member of the Redevelopment Commission
6. A member of the Plan Commission
7. A member of the Board of Zoning Appeals
8. A member of the Owen Valley Fire Territory

## **APPENDIX “E”**

### **ACKNOWLEDGEMENT OF RECEIPT OF POLICY**

I have received a copy of the Town of Spencer’s Title VI policy and understand that it is my responsibility to become familiar with the contents of the policy.

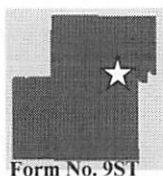
I understand that all employees are expected to follow the Title VI policy and guidelines as set forth. All Town of spencer employees should make every effort to alleviate any barriers to service or public use that would restrict public access or usage, take prompt and reasonable action to avoid or minimize discrimination incidences and immediately notify the Title VI Coordinator, in writing, of any questions, complaints or allegations of discrimination.

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Employee Signature

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Employee Printed Name



## APPENDIX "F"

### *Town of Spencer*

90 N West Street  
Spencer, Indiana 47460  
Phone (812) 829-3213

## TITLE VI COMPLAINT

Please return to: Title VI Coordinator, 90 N West St, Spencer, Indiana 47460

Upon request, reasonable accommodation will be provided in completing this form or copies of the form will be provided in alternative formats. Contact the Title VI Coordinator at the address listed above or via telephone at (812) 829-3213.

A complaint must be filed within 180 days of the alleged act of discrimination.

Complainant Name:		Phone Number: (       )       -
Address:		
City:	State:	Zip:
Name of Person Preparing Complaint (if different from Complainant):		Phone Number: (       )       -
Address:		
City:	State:	Zip:
Date of the alleged violation:		
Person Discriminated Against (If someone other than the complaint):		
Please indicate why you believe the discrimination occurred:		
<input type="checkbox"/> Race <input type="checkbox"/> Age <input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Disability <input type="checkbox"/> Religion <input type="checkbox"/> Income Status <input type="checkbox"/> Color <input type="checkbox"/> Sex		
<input type="checkbox"/> Gender identity <input type="checkbox"/> National Origin <input type="checkbox"/> Limited English Proficiency <input type="checkbox"/> Other: _____		
Please describe the alleged discrimination. Be as specific as possible in explaining what happened and whom you believe was responsible (attach additional pages, if necessary):		
Please list any and all witnesses' names, phone numbers, addresses, and email addresses:		

What type of remedy would you suggest?	
Have you filed a complaint with any other federal, state or local agency, or within any federal or state court?	
<input type="checkbox"/> Yes, what agency? _____ <input type="checkbox"/> No	
Signature:	Date:

**Office Use Only**

Date Complaint received by Title VI Coordinator:	Final date for initiation of meeting (must be within 15 days of the date the complaint was received):
Actual Date of Initial Meeting:	Final date to respond in writing as to the results of the meeting (within 60 days of the meeting date):

## APPENDIX "G"

### COMPLAINANTS WRITTEN CONSENT FOR RELEASE OF INFORMATION

Name of Complainant:		
Address:		
City:	State:	Zip:
Email:		
In order for a complete and thorough investigation of my Title VI complaint, I hereby authorize Dearborn County, Indiana to release the following information concerning my complaint:		
The documents to be released are described or listed as:		
I authorize this information to be released to: _		
I understand the information will be handled confidentially in compliance with applicable federal laws. I understand that I may see the information that is to be sent. I understand that I may revoke the authorization at any time by written, dated communication. I have read and understand the nature of this release.		
Signature:		Date:

Completed form must be submitted to:

**Jon Stantz**  
Town of Spencer  
90 N West Street  
Spencer, Indiana 47460  
Phone (812)236-9097  
Email: [jon@pellroofing.com](mailto:jon@pellroofing.com)

## APPENDIX "H"

### VOLUNTARY TITLE VI PUBLIC INVOLVEMENT SURVEY

As a recipient of federal funds, the Indiana Department of Transportation (INDOT) is requiring local agencies to develop a procedure for gathering statistical data regarding participants and beneficiaries of its federal-aid highway programs and activities (23 CFR §200.9(b)(4)). The Town of Spencer, Indiana is distributing this voluntary survey to fulfill that requirement to gather information about the populations affected by proposed projects. You are not required to complete this survey. Submittal of this information is voluntary. This form is a public document that the Town of Spencer, Indiana will use to monitor its programs and activities for compliance with Title VI and the Civil Rights Act of 1964, as amended and its related statutes and regulations. If you have any questions regarding the Town of Spencer, Indiana's responsibilities under Title VI of the Civil Rights Act of 1964 or the Americans with Disabilities Act, please contact:

**Jon Stantz**  
Town of Spencer  
90 N West Street  
Spencer, Indiana 47460  
Phone (812)236-9097  
Email: [jon@pellroofing.com](mailto:jon@pellroofing.com)

You may return the survey by folding it and placing it next to the forms hereto or by mailing or e-mailing it to the address of the Title VI Coordinator above.

Date:	
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female	Ethnicity: <input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Not Hispanic or Latino
Race:	
<input type="checkbox"/> American Indian or Alaska Native <input type="checkbox"/> Native Hawaiian or Other Pacific Islander	
<input type="checkbox"/> Black or African-American <input type="checkbox"/> Asian <input type="checkbox"/> White <input type="checkbox"/> Multiracial	
Age: <input type="checkbox"/> 1-21 <input type="checkbox"/> 22-40 <input type="checkbox"/> 41-65 <input type="checkbox"/> 65+	
Disability: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Household Income:	
<input type="checkbox"/> \$0-\$12,000 <input type="checkbox"/> \$12,001 - \$24,000 <input type="checkbox"/> \$24,001 - \$36,000 <input type="checkbox"/> \$36,001 - \$48,000	
<input type="checkbox"/> \$48,001 - \$60,000 <input type="checkbox"/> \$60,000+	

## **APPENDIX "I"**

### **STATEMENT OF NONDISCRIMINATION**

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial Assistance" (42 U.S.C. Section 2000d).

Pursuant to Title VI of the Civil Rights Act of 1964, as amended, and the Civil Rights Restoration Act of 1987, Town of Spencer, Indiana, hereinafter referred to as "Town of Spencer," will not exclude from participation in, deny the benefits of, or subject to discrimination any individual on the grounds of race, color, or national origin, sex, age, disability, limited English proficiency and income status.

The Spencer Town Board has prepared this statement of nondiscrimination and its intent to comply and enforce Title VI of the Civil Rights Act of 1964 that statement is posted in all public buildings owned and operated by Town of Spencer. Additionally, the posting provides information about how to raise concerns or lodge complaints related to potential violations of Title VI.