

2025 Title VI Plan

Town of Waterloo, Indiana



BRITTANIE PATRICK
TITLE VI COORDINATOR

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I. Introduction

This Title VI Plan Update revises several portions of the last Title VI Implementation Plan. The update is part of Town of Waterloo continual and ongoing effort to comply with civil rights regulations. This policy's intent to proactively meet and exceed the minimum compliance requirements established under Title VI of the Civil Rights Act of 1964 (Title VI), 49 CFR § 26, and the related anti-discrimination statutes and regulations. With this the Town of Waterloo seeks to provide continued transparency, clarity, and technical guidance for internal and external constituents regarding its Title VI program.

II. Town of Waterloo Title VI Mission Statement

Town of Waterloo will implement compliance with Title VI 49 CFR § 26; and its related statutes and regulations to ensure that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation (DOT) on the grounds of race, color, national origin, disability, sex, sexual orientation, gender identity, religion, age, low-income status or limited English proficiency.

Town of Waterloo will continue to develop additional manuals and directives as needed to provide guidance regarding Title VI and ADA compliance and will be made available where appropriate.

III. Town of Waterloo Non-Discrimination Statement

Town of Waterloo values each individual's civil rights and wishes to provide equal opportunity and equitable service for the citizens of this town. As a recipient of federal funds, Town of Waterloo is required to conform to Title VI and all related statutes, regulations, and directives, which provide that no person shall be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from the DOT on the grounds of race, color, national origin, disability, sex, sexual orientation, gender identity, religion, age, low income status or limited English proficiency.

In accordance with these values, INDOT has appointed a Title VI Coordinator. The current coordinator is:

Brittanie Hobbs,
Town Manager
Title VI Coordinator
280 S Wayne St. P.O. Box 96
Waterloo, IN, 46793

The Title VI Coordinator oversees compliance efforts and relies on Title VI Liaisons in each town department to ensure town-wide compliance with Title VI.

IV. Title VI Assurances

These are standard U.S. DOT assurances that outline the Towns guarantee for compliance with Title VI of the Civil Rights Act of 1964 as a recipient of federal financial assistance. The executed assurances are included in the following pages.

V. Title VI Compliance Responsibilities

A. Title VI Coordinator & ADA Coordinator

The Title VI Coordinator and ADA Coordinator oversee the coordination of Town of Waterloo compliance with Title VI and Section 504 statutes, regulations, and directives. The coordinator reports directly to the Town Council. Responsibilities include, but are not limited to:

- Implementing Town of Waterloo Title VI and Americans with Disability Act (ADA) Transition Plans
- Assisting with the development of processes and procedures for the investigation of complaints filed under Title VI and ADA
- Coordinating Title VI and ADA program development with Title VI/ADA Liaisons
- Preparing required reports as necessary
- Participating in the design, development, and dissemination of Title VI and ADA information to the public; and
- Town of Waterloo Title VI Implementation Plan and ADA Transition Plan as required

B. Title VI/ADA Liaisons

This interdisciplinary team is composed of department heads from each department in Town of Waterloo. They are responsible for the following:

- Ensure compliance with Title VI and related nondiscrimination laws
- Remove programmatic and architectural barriers from programs and activities in accordance with relevant nondiscrimination laws
- Ensure meaningful access to Town services and programs to minorities, persons with limited English proficiencies and low-income persons; and
- Provide input in the development and review of the Title VI and ADA implementation plans

C. Coordinator & Liaison Contact Information

All concerns should be directed to the Title VI or ADA Coordinator; however, additional contacts for each department are listed in Appendix A

VI. Title VI Compliance Review Process

The Town of Waterloo is making great strides in complying with Title VI statutes and regulations. It is proposed that the Title VI Coordinator review the Towns policies with each Title VI Liaison on an annual basis to determine town-wide compliance and identify areas of improvement.

VII. External Complaint Process

Town of Waterloo will promptly investigate all properly submitted complaints of alleged discrimination. Waterloo Indiana will also attempt to resolve such complaints and take corrective action upon a finding of a substantiated complaint.

A. Complaint Investigation Procedures

The Title VI and ADA Coordinators will make a determination to accept, reject, or refer to the appropriate agency a complaint within seven working days of its receipt. Town of Waterloo will determine whether the person or entity purportedly engaged in the alleged discriminatory act as a sub-recipient of federal funds. If the complaint does not specifically mention that the alleged discriminatory actor is a sub-recipient of federal funds, Town of Waterloo may presume so in deciding whether to accept the complaint for further processing.

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 and its related statutes, regulations and directives; the Americans with Disability Act of 1990, as amended; and Section 504 of the Vocational Rehabilitation Act of 1973. These procedures do not affect the right of the Complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the Complainant.

Town of Waterloo will make every effort to facilitate a voluntary early resolution of complaints at the lowest level possible. The Town may exercise the option of informal resolution at any stage of the process.

B. Who May File a Complaint

Any person who believes that he or she has been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Town of Waterloo service, program, or activity whether federally funded or not, based on their race, color, national origin, gender, age, disability, religion, ancestry, income status, or Limited English Proficiency may file a complaint. A complainant's representative may also file a complaint on the behalf of such a person.

C. Timeliness of Complaints

For a complaint to be considered timely, it must be filed within 180 calendar days after the alleged incident has occurred. The file date of a complaint is the earlier of the postmark or date received by Town of Waterloo.

D. Location/Availability of Complaint Forms

Town of Waterloo will make complaint forms available online via the Town's website. Additionally, persons may contact the Title VI or ADA Coordinator to request a copy of the complaint form via email, facsimile, or United States mail. Copies of complaint forms in alternative formats are available upon request.

E. How to File a Complaint

A complainant may file his or her complaint by mail, facsimile, or email. Any person with a disability may request to file his or her complaint using an alternative format. Town of Waterloo will acknowledge complaints received by fax or email and will process them once the Town establishes the identity of the complainant. Complainants must mail a signed, original copy of the fax or email transmittal to the Town to begin the complaint process. Town of Waterloo does not require a complainant to use the Town complaint form for submitting his or her complaint.

Direct Title VI Complaints to:

Brittanie Hobbs, Town Manager
 Title VI Coordinator
 280 S Wayne St. P.O. Box 96
 Waterloo, IN, 46793
townmanager@waterlooin.gov
 (260) 837-7428

Direct ADA Complaints to:

Brittanie Hobbs, Town Manager
 ADA Coordinator
 280 S Wayne St. P.O. Box 96
 Waterloo, IN, 46793
townmanager@waterlooin.gov
 (260) 837-7428

F. Elements of a Complete Complaint

A complete complaint is written and signed. Verbal complaints must be reduced to writing and provided to the complainant for confirmation, review, and signature before processing. The complaint form is available in the appendix of this report and on the Town's website.

Additionally, a complete complaint is filed within 180 calendar days of the alleged discriminatory act(s) and includes at minimum the following information:

- The full name and address of the complainant
- The full name and address of the respondent, the individual, agency, department, or program that allegedly discriminated against complainant; and
- A description of the alleged discriminatory act(s) that violated the Title VI (i.e., an act of intentional discrimination or one that has the effect of discriminating on the basis of race, color, national origin, sex, age, or disability) and the date of occurrence.

The following items are not acceptable as a complete complaint:

- Anonymous complaints

- Inquiries seeking advice or information
- Newspaper articles
- Courtesy copies of court pleadings
- Courtesy copies of complaints addressed to other agencies
- Courtesy copies of internal grievances
- Oral complaints

The Title VI or ADA coordinator shall notify the complainant in writing if his or her complaint is incomplete and allot 15 calendar days for the complainant to respond and provide the supplemental information needed to complete the complaint.

G. Processing Complaints

The Title VI and ADA Coordinator will process all complaints and will:

- Maintain a log of all complaints
- Acknowledge receipt of a complaint and inform the complainant of the action taken or proposed action to be taken to process the complaint
- Inform respondent of allegations and request a position statement and response to all aspects of the complainant's allegations
- Coordinate investigation and assign a staff member to the case
- Contact the complainant at the conclusion of the investigation

H. Corrective Action

If the Town of Waterloo recommends corrective action, the Town will give the respondent 30 calendar days to inform the Town of the actions taken for compliance. The Title VI or ADA coordinator shall monitor the respondent's corrective action compliance.

Corrective action may include actions that the respondent will complete at a future date of the initial 30 days and must include project time in which the respondent will complete the action.

If the respondent has not taken the recommended corrective action within the 30-day period allowed, Town of Waterloo will for the respondent to be in noncompliance with Title VI and its implementing regulations. Noncompliance not corrected by informal means as described above may be subject to sanctions as per 49 CFR § 21.13.

I. Pre-Investigative/Administrative Closures

It is the general practice of the Town of Waterloo to investigate all complete complaints; however, the Town may administratively close a complaint at its discretion. The types of complaints that may be administratively closed and will not be investigated include, but are not limited to, the following:

- Complaints that fail to state a claim or provide any substantial or coherent claim

- Complaints that are outside the scope of Town’s Title VI jurisdiction
- Untimely complaints filed more than 180 days after the alleged discriminatory acts
- Complaints voluntarily withdrawn by the complainant
- Complaints in which the investigation has been impaired by the Town’s ability to locate the complainant
- Complaints that are a continuation of a pattern of previously filed complaints involving the same or similar allegations against the same recipient or other recipients that repeatedly have been found factually or legally unsubstantiated by the Town of Waterloo
- Complaints containing the same allegations and issues that have been addressed in a recently closed complaint or compliance review conducted by the Town
- Complaints containing allegations that are foreclosed by previous decisions by the Federal courts, Department of Justice, or Town policy determinations
- Complaints filed for complainants or parties who refuse to cooperate with the investigation and whose lack of cooperation substantially impairs the completion of the investigation
- Complaints transferred to another agency for investigation; and
- Complaints where the death of a complainant makes it impossible to investigate the allegations fully

Town of Waterloo shall notify complainant in writing when a determination is made to administratively close a case without further investigation. The notification shall include an explanation of the basis for administrative close.

J. Confidentiality

In accordance with DOT Order 1000.12, Town of Waterloo shall keep all complainants’ identities confidential except to the extent necessary for carrying out an investigation. If an investigator determines that it is necessary to disclose the complainant’s identity to the responder or a third party, the investigator must first obtain complainant’s written permission.

K. Records

Town of Waterloo shall maintain all records of an investigation in a confidential area for three years after the completion of the investigation.

L. Summary of Complaints Received

No complaints have been filed within the reporting period.

VIII. Public Involvement and Outreach

A. Website

Town of Waterloo recently upgraded its website for better functionality and access. A dedicated Title VI/ADA webpage has been included to provide vital information to the public. Please visit <https://waterlooin.gov/ada-title-vi-policy/>.

B. Data Collection

Town of Waterloo plans to utilize a voluntary public involvement survey to collect information regarding persons affected by proposed projects. The survey permits respondents to remain anonymous, while voluntarily answering questions regarding their gender, ethnicity, race, age, disability status, and household income.

Town of Waterloo plans to make this survey available at all public hearings and meetings. Completed surveys shall be retained for a period of three years from the date of the meeting and/or completion of the related project, if applicable.

IX. Manuals, Directives, and Guidance

Town of Waterloo plans to incorporate Title VI policy and mission statements into its employee handbook for the next revision.

Town of Waterloo Title VI Policy Statement

Town of Waterloo values each individual's civil rights and wishes to provide equal opportunity and equitable service for the citizens of this town. As a recipient of federal funds, Town of Waterloo is required to conform to Title VI and all related statutes, regulations, and directives, which provide that no person shall be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from the DOT on the grounds of race, color, national origin, disability, sex, sexual orientation, gender identity, religion, age low income status or limited English proficiency.

X. Limited English Proficiency

On August 11, 2000, President William J. Clinton signed an executive order, Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. It had as its purpose, to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language.

Town of Waterloo strives to serve its population to the best of its ability. According to the U.S. Census Bureau, the percentage of LEP population in Town of Waterloo recorded during the time period of 2007-2011 is approximately 1.3 percent. To accommodate these individuals, Town of Waterloo provides, upon request, services to assist the LEP population including translation of vital documents, interpretation

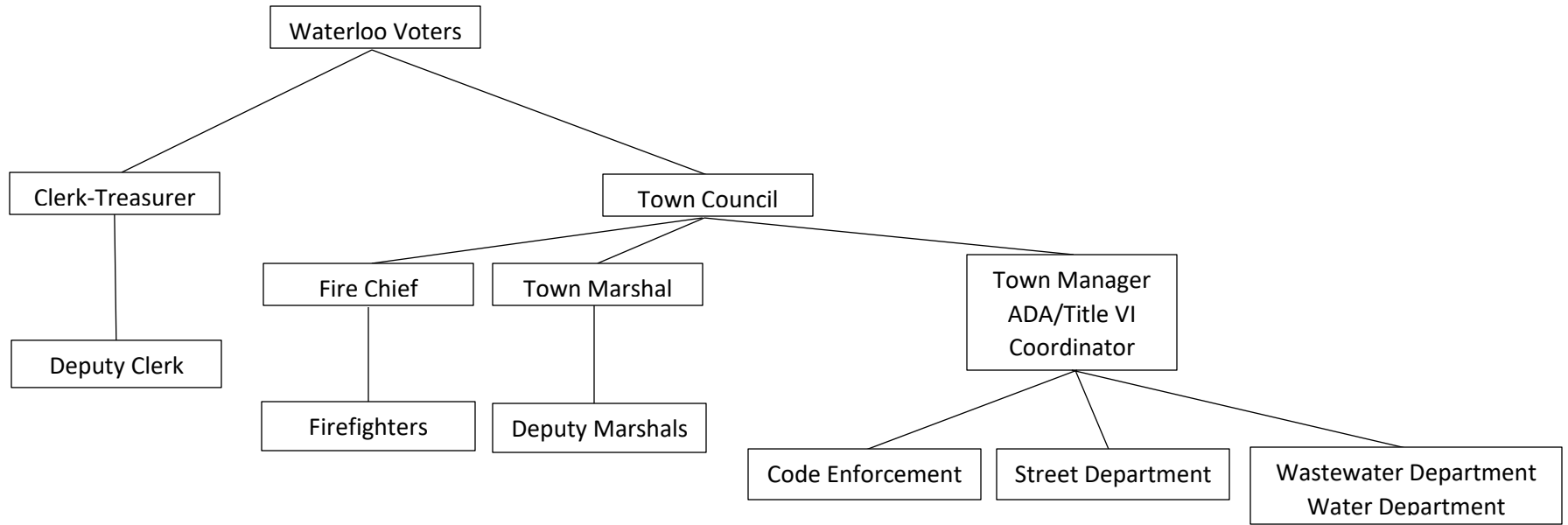
services, and alternative public outreach media. Language cards have been provided to each department for assistance in providing services to limited English proficiency individuals. Progress is still being made to fully serve the entire Waterloo community.

XI. Accomplishments

Refer to Appendix G.

Appendix A: Town Organizational Chart

Town of Waterloo, Organizational Chart



Appendix B: Sample Title VI Complaint Log

Appendix C: Title VI Complaint Procedure



EXTERNAL COMPLAINT OF DISCRIMINATION

INSTRUCTIONS:

The purpose of this form is to help any person interested in filing a discrimination complaint with Town of Waterloo. You are not required to use this form. You may write a letter with the same information, sign it, and return it to the address below. All bold items must be completed for your complaint to be investigated. Failure to provide complete information may impair the investigation of your complaint.

Title VI of the Civil Rights Act of 1964, as amended and its related statutes and regulations (Title VI) prohibit discrimination on the basis of race, color, national origin, sex, age, disability/handicap, or income status in connection with programs or activities receiving federal financial assistance for the United States Department of Transportation, Federal Highway Administration, and/or Federal Transit Administration. These prohibitions extend to Town of Waterloo as a sub-recipient of federal financial assistance.

Upon request, assistance will be provided if you are an individual with a disability or have limited English proficiency. Complaints may also be filed using alternative formats such as computer disk, audiotape, or Braille.

You also have the right to file a complaint with other state or federal agencies that provide federal financial assistance to Town of Waterloo. Additionally, you have the right to seek private counsel.

Town of Waterloo is prohibited from retaliating against any individual because he or she opposed an unlawful policy or practice, filed charges, testified, or participated in any complaint action under Title VI or other nondiscrimination authorities.

Please make a copy of your complaint form for your personal records. Do not send your original documents as they will not be returned. Mail the original complaint form along with any copies of documents or records relevant to your complaint to the address below.

Complaints of discrimination must be filed within 180 days of the date of the alleged discriminatory act. If the alleged act of discrimination occurred more than 180 days ago, please explain your delay in filing this complaint.

****Your complaint cannot be processed without your signature.**

Appendix D: External Complaint of Discrimination Form

COMPLAINT INFORMATION

Name (first, middle, and last)

Address (number and street, city, state and ZIP code)

Home telephone number

() -

Work telephone number

() -

Cellular telephone number

() -

Name of complainant

Date (month, day, year)

PERSON/AGENCY/COMPANY YOU BELIEVE DISCRIMINATED AGAINST YOU

Name (first, middle, and last)

Title

Name of company

Address (number and street, city, state and ZIP code)

Home telephone number

() -

Work telephone number

() -

Mobile telephone number

() -

When was the last alleged discriminatory act? (month, day, year) _____

Complaints of discrimination must be filed within 180 days of the date of the alleged discriminatory act. If the alleged act of discrimination occurred more than 180 days ago, please explain your delay in filing this complaint.

The alleged discrimination was based on:

_____ Race	_____ Color	_____ Age	_____ Gender Identity
_____ Disability	_____ National Origin	_____ LEP	_____ Retaliation
_____ Religion	_____ Sex	_____ Income	_____ Sexual Orientation
_____ Other			

Name of complainant

Date (month, day, year)

Describe the alleged act(s) of discrimination (use additional pages, if necessary)

Lined area for describing the alleged act(s) of discrimination.

Name of complainant	Date (month, day, year)
---------------------	-------------------------

Provide the names of any individual(s) with additional information regarding your complaint:

Name of witness 1 (first, middle, and last)	Title
---	-------

Name of company

Address (number and street, city, state and ZIP code)

Home telephone number () -	Work telephone number () -	Mobile telephone number () -
--------------------------------	--------------------------------	----------------------------------

Include a brief description of the relevant information the witness may provide to support your complaint of discrimination.

Name of witness 2 (first, middle, and last)	Title
---	-------

Name of company

Address (number and street, city, state and ZIP code)

Home telephone number () -	Work telephone number () -	Mobile telephone number () -
--------------------------------	--------------------------------	----------------------------------

Include a brief description of the relevant information the witness may provide to support your complaint of discrimination.

Name of witness 3 (first, middle, and last)	Title
---	-------

Name of company

Address (number and street, city, state and ZIP code)

Home telephone number () -	Work telephone number () -	Mobile telephone number () -
--------------------------------	--------------------------------	----------------------------------

Include a brief description of the relevant information the witness may provide to support your complaint of discrimination.

Name of complainant	Date (month, day, year)
How would you like your complaint to be resolved? <hr/> <hr/>	
Have you filed a complaint alleging the same discrimination with another state or federal agency? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide the following information for each agency:	
Name of agency	Date complaint filed (month, day, year)
Case number assigned to your complaint	Current status of your complaint
How did you learn about your right to file a discrimination complaint with the Town of Waterloo? <hr/> <hr/>	
Signature	Date signed (month, day, year)

Appendix E: Voluntary Title VI Public Involvement Survey



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 CRF §200.9(b)(4)). Town of Waterloo 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 Waterloo 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 Town of Waterloo’s responsibilities under Title VI of the Civil Rights Act of 1964 or the Americans with Disabilities Act, please contact Brittanie Patrick, ADA Coordinator and Title VI Coordinator.

You may return the survey by folding it and placing it on the registration table or by mailing or e-mailing it to the address below.

Date: <i>(month, day, year)</i>					
Project Name:					
Proposed Project Location:					
Gender:		<input type="checkbox"/> Female	<input type="checkbox"/> Male	Ethnicity:	
				<input type="checkbox"/> Hispanic or Latino	<input type="checkbox"/> Not Hispanic or Latino
Race: <i>(Check one or more)</i>					
<input type="checkbox"/> American Indian or Alaska Native				<input type="checkbox"/> Asian	
<input type="checkbox"/> Native Hawaiian or Other Pacific Islander				<input type="checkbox"/> White	
<input type="checkbox"/> Black or African-American				<input type="checkbox"/> Multiracial	
Age:			Disability:		
<input type="checkbox"/> 1-21		<input type="checkbox"/> 22-40		<input type="checkbox"/> Yes	
<input type="checkbox"/> 41-65		<input type="checkbox"/> 65+		<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"/> \$60,001+	

Brittanie Hobbs, Town Manager
Title VI Coordinator
280 S Wayne St. P.O. Box 96
Waterloo, IN, 46793
townmanager@waterlooin.gov

Appendix F: Goals

Title VI Goals

- Comply with Title VI training requirements
<https://www.in.gov/indot/accessibility-and-non-discrimination/title-vi-ada-information-and-resources-for-consultants-and-contractors/>
- Continue to review all services, procedures, protocols, policies, and departments for potential risks of discrimination
- Continue to develop measures to reduce potential risks of discrimination
- Post Title VI policy on bulletin boards in municipally owned buildings
- Prepare an annual Goals and Accomplishments Report and post on Town's website

Appendix G: Accomplishments

Accomplishments	Completion Date
[INPUT ACCOMPLISHMENTS HERE]	[INPUT COMPLETION DATE HERE]