

Town of Huntertown,
Indiana

Title VI

Program and
Implementation Plan

February 2017

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Title VI Policy Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, national origin, disability, religion, sex, sexual orientation, gender identity, age, low income status or limited English proficiency 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, national origin, disability, religion, sex, sexual orientation, gender identity, age, low income status or limited English proficiency 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).

Huntertown, Indiana is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color, national origin, disability, religion, sex, sexual orientation, gender identity, age, low income status or limited English proficiency as protected with Title VI (Exhibit 1).

This plan was developed to guide Huntertown, Indiana in its administration and management of Title VI-related activities.

Organization and Staffing

The Town Council of Huntertown, Indiana is responsible for ensuring the implementation of the Town's Title VI Program.

The Town Hall Office Manager, Rosemary Scheele serves as the Title VI Coordinator, on behalf of the Town Council (Exhibit 2). The Title VI Coordinator is responsible for the overall management of the Title VI Program to ensure compliance with provisions of the Town's policy of non-discrimination with the law, including the requirements of 23 Code of Federal Regulation (CFR) 200 and 49 Code of Federal Regulation 21. The contact information for the Title VI Coordinator is as follows:

Rosemary Scheele
Title VI Coordinator
15617 Lima Road
Huntertown, IN 46748
260-637-5058
260-637-5891 FAX
roseks23@cs.com

Title VI Coordinator Responsibilities

The Title VI Coordinator is responsible for implementing, monitoring, and ensuring the Town's compliance with Title VI regulations and the overall administration of the Title VI Program and Standard U.S. Title VI Assurances (Exhibit 3). This includes the completion of the following activities:

- Program Administration – Administer the Title VI Program and coordinate implementation of the plan. Ensure compliance with the assurances, policy, and program objectives. Perform Title VI Program reviews to assess and update administrative procedures, staffing, and resources; provide recommendations as required to the Commissioners.
- Data collection – Review and analyze the statistical data gathering process performed by the Title VI Liaisons (Department Heads) periodically to ensure sufficiency of data for meeting the requirements of the Title VI program administration. Document the analysis for the Federal Highway Administration (FHWA).
- Training Programs – Conduct or facilitate training programs or Title VI current and new regulations for Town employees; and facilitate Title VI training for Title VI Liaisons, contractors, and sub-recipients. A summary of training conducted will be reported in the annual update to INDOT.
- Title VI Plan Update – Review and update the Title VI Plan annually as needed or required. Present the updated plan to the Commissioners for approval; submit amended Plan to INDOT as required.
- Reporting – The Title VI coordinator may conduct reviews of the Town's Title VI Program to assess for Title VI compliance to assure effectiveness in compliance with Title VI provisions. The Title VI Coordinator and the Title VI Liaisons will coordinate efforts to ensure the requirements of Title VI are met.
- The Title VI Coordinator will prepare an annual summary to report accomplishments and changes to the program during the preceding year. This summary will also include goals and objectives for the upcoming year.
- Public Dissemination – Work with the Title VI Liaisons to develop and disseminate Title VI Program information to the Town employees and sub-recipients, including contractors, subcontractors, consultants, sub-consultant and the general public. Public dissemination may include postings of official statements, inclusions of the Title VI language in contracts or other agreements, website postings, and an annual publication of the Town's Title VI Policy Statement in the newspaper and informational brochures. Ensure public service announcements or notices are posted of proposed projects, hearings, meetings, or formation of public advisory boards, in newspapers or other media reaching the affected community. Ensure the full utilization of available minority publications or media; and, where appropriate, provide written or verbal information in

languages other than English. (See Exhibit 4 for the Town’s Title VI Notice to the Public.)

- Complaints – The Title VI coordinator will ensure the Complaint Procedure for filing, review and investigating Title VI complaints received by Huntertown will follow procedural guidelines. Ensure every effort is made to resolve complaints and properly document and maintain a log of all complaints.
- Elimination of Discrimination – Work with the Title VI Liaisons to establish procedures for promptly resolving deficiencies, as needed. Recommend procedures to identify and eliminate discrimination that may be discovered in the Town’s processes.
- Develop and implement Huntertown’s Limited English Proficiency (LEP) Plan; provide training to the Department Heads on procedure to follow when a person requests an interpreter.
- Establish procedures for reviewing contracts with sub-recipients, special interest programs and activities to include in Title VI assurance.
- Attend Title VI Training as required by INDOT.

Department Head (Title VI Liaison) Responsibilities

The Department Heads are as follows:

Name	Department	Contact #	Email Address
Ryan Schwab	Clerk-Treasurer	260-637-5058	clerk@huntertown.org
Donald Papai	Town Utilities	260-637-5058	superintendent@huntertown.org
			-
			-
			-
			-
			-
			-
			-

Each Department Head within Huntertown is responsible for the following under Title VI:

- Ensuring all Huntertown contract documents contain the appropriate Title VI provisions;
- Consulting with the Town Council and the Title VI Coordinator when Title VI complaints are received or issues arise;

- Ensure that all people are treated equitably regardless of race, color, national origin, disability, religion, sex, sexual orientation, gender identity, age, low income status or limited English proficiency;
- Develop and update internal policies and procedures to ensure Title VI compliance during all phases of projects, activities, etc.;
- Ensure all business pertaining to the selection, negotiation and administration of consultant contracts and agreements is accomplished without discrimination based on race, color, national origin, disability, religion, sex, sexual orientation, gender identity, age, low income status or limited English proficiency;
- Ensure internal and external publications and all other relevant communications disseminated to the public include the Title VI policy reference; and
- Provide information in the appropriate language or interpreters as needed for individuals with disabilities and LEP persons.

Department Head (Title VI Liaison) Reporting

The Department Heads must submit the Title VI Compliance Review Form (Exhibit 5) to the Title VI Coordinator to be used as an assessment tool to determine whether the departments are in compliance with Title VI and to ascertain instances where the Title VI Coordinator may provide training to help the Department Heads achieve its Title VI goals and maintain compliance. The Title VI Coordinator will review the data collection procedures for each department periodically to ensure compliance with Hometown's Title VI Program requirements. The Department Heads should prepare the report and submit it annually on or around June 30th of each year.

The following information should be included in each annual report submitted:

- Number of federally funded projects awarded during the past year.
- Number of Title VI complaints received during the past year.
- Attendance at public meeting/hearing tracked and broken down by ethnicity, race, gender and disability.
- Statistical data collected on ethnicity, race gender and disability for communities impacted by construction projects.
- Does your staff understand the Title VI Policy and Procedures set in place for the Town?
- Statistical data collected on ethnicity, race, gender and disability for all right-of-way relocates.
- Proof of public dissemination of the Title VI Policy or Policy Statement.
- Information concerning the dissemination of copies of the Civil Rights Act of 1964 non-discrimination statement;

- Information on number of individuals who received Title VI training in each department including attendees, dates and locations.
- Information on number of LEP persons needing assistance including service used and related cost;
- A description of the communication needs of LEP persons;

Training

The Title VI coordinator will make Title VI Program and the LEP Plan training available to employees, contractors, sub-recipients, and the Title VI Liaisons. The training will be documented on the Training Log (Exhibit 6). The training will provide information on Title VI provisions and operation and identifying Title VI issues and resolution of complaints. A summary of the training conducted will be included in the annual summary.

External Complaint Process

The Town will promptly investigate all properly submitted complaints of alleged discrimination. The Town will also attempt to resolve such complaints and take corrective action upon a finding of a substantiated complaint. Within 60 days of receiving a complete complaint, the Town will submit its final investigative report to INDOT. The Town's complaint process provides a procedure for appeal of all unsubstantiated claims of discrimination (Exhibit 7).

Complaint Investigation Procedures

The Title VI Coordinator will make a determination to accept, reject or refer to the appropriate federal/state agency a complaint within seven (7) calendar days of its receipt. The Town will determine whether the person or entity purportedly engaged in the alleged discriminatory act is a Town sub-recipient (the legal entity to which the Town made a sub-award and which is accountable to the recipient for the use of the funds provided). If the complaint does not specifically mention that the alleged discriminatory factor is a Town sub-recipient, the Town 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. 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.

The Town 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. The Title VI Coordinator will make every effort to pursue a resolution of the complaint.

The Title VI Coordinator may refer all complaints against the Town to INDOT or the FHWA or the appropriate Federal agency.

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 service, program or activity whether federally funded or not, based on their race, color, national origin, disability, religion, sex, sexual orientation, gender identity, age, low income status or limited English proficiency may file a complaint. A complainant's representative may also file a complaint on behalf of such a person.

Timeliness of Complaints

For a complaint against the Town or a sub-recipient to be considered timely, it must be filed within 60 days after the alleged incident has occurred. The Town may waive the 60-day time limit for good cause at its discretion.

The file date of a complaint is the earlier of the postmark or date received by the Town.

The Town will determine on a case-by-case basis whether to waive the time limit for good cause. Good cause for a waiver shall include, but is not limited to, the following instances:

- **Lack of Knowledge**

The Town may waive the time limit in situations where the person on whose behalf the complaint was filed did not know of and could not have reasonably known of the violation during the 60-day time limit. The complainant must file his or her complaint within 60 days of becoming knowledgeable of the violation.

- **Incapacitation**

The Town may also waive the time limit in situations where the person on whose behalf of the complaint was filed was incapacitated because of illness or other documentation of the purported incapacitation. The complainant must file his or her complaint within 60 days after the period of incapacity ends.

Location/Availability of Complaint Forms

The Complaint Form is available online via the Town website. Additionally, persons may contact the Title VI Coordinator to request a copy of the complaint form via email, facsimile or United States mail. The Town's Title VI Coordinator shall provide copies of its complaint form in alternative formats upon request.

How to File a Complaint

A Complainant may file his or her complaint by U. S. mail, facsimile, or email. Any person with a disability may request to file his or her complaint using an alternative format. The Town 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. The Town does not require a Complainant to use the Town's complaint form for submitting his or her complaint.

Direct Title VI complaints to:

Rosemary Scheele
Title VI Coordinator
15617 Lima Road
Huntertown, IN 46748
260-637-5058
260-637-5891 FAX
roseks23@cs.com

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 Title VI Complaint of Discrimination form is available for download from the Town's website at: <http://www.huntertown.org>. Additionally, a complete complaint is filed within 60 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 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, disability, religion, sex, sexual orientation, gender identity, age, low income status or limited English proficiency) and the date of occurrence.

The following items are not acceptable as a complete complaint unless accompanied by a signed cover letter that specifically requests the Town take action concerning the allegations:

- 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 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.

Processing Complaints

The Title VI Coordinator will process all complaints. The Title VI Coordinator is responsible for:

- Maintaining a log of all complaints. The Title VI Coordinator will note the complaint in the log (Exhibit 8) by sequential case number based on the year, month and order in which the Town received the complaint. For example, if the Town received its first complaint on March 4, 2011, the case number would be 2011-03-01.
- Acknowledging receipt of the complaint and informing the Complainant of the action taken or proposed action to be taken to process the complaint in the form of an acknowledgement letter. The acknowledgement letter shall include a restatement of the complaint, brief statement of the Town's jurisdiction over the sub-recipient if the complaint is regarding a sub-recipient, and contact information for the investigator assigned to conduct the investigation.
- Providing written notice of the complaint to INDOT within 10 working days of receipt of the complaint.
- Forwarding a notice via certified mail to the Respondent informing them of the allegations, requesting a position statement and providing the name and telephone number of the Title VI Program staff person assigned to investigate the complaint.
- Informing the Complainant that he or she has a right: (1) to have a witness or representative present during any interviews and (2) to submit any documentation he or she perceives as relevant to proving the allegations contained in the complaint.
- Providing the Respondent an opportunity to respond to all aspects of the Complainant's allegations.
- Determining which witnesses will be contacted and interviewed.
- Contacting the Complainant at the conclusion of the investigation to provide the Complainant an opportunity to provide additional information before the Town prepares its final report to be forwarded to INDOT.
- Writing a confidential investigative report (IR) and forwarding a copy of the same to

INDOT. The report shall not be disclosed to the Complainant or Respondent. The report shall include the following:

- A summary of the written complaint;
 - A brief description of the standard of review/methodology used to investigate the complaint;
 - Summarized statements taken from witnesses;
 - Findings of fact and an analysis of the evidence gathered. The analysis should address each allegation in the complaint and Respondent's position;
 - A determination, based on the preponderance of evidence presented, of whether the complaint is substantiated or unsubstantiated; and
 - Proposed corrective action for substantiated cases.
- Drafting a Letter of Findings (LOF) and mailing the LOF to INDOT, Respondent and Complainant (by certified mail) within 60 calendar days of the date the complaint was received by the City. The LOF will include the following:
- A summary of the written complaint;
 - A brief description of the standard of review/methodology used to investigate the complaint;
 - Findings of fact and an analysis of the evidence gathered. The analysis should address each allegation in the complaint and Respondent's position;
 - A determination, based on the preponderance of evidence presented, of whether the complaint is substantiated or unsubstantiated;
 - Proposed corrective action for substantiated cases; and
 - A notice of the right to appeal to the FHWA with an outline of the procedures for appeal.

Corrective Action

If the Town 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 Coordinator shall monitor Respondent's corrective action compliance. Corrective action may include actions that the Respondent will complete at a future date after the initial 30 days and must include projected 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, the Town will find 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.

Pre-Investigative/Administrative Closures

It is the general practice of the Town 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 the Town’s Title VI jurisdiction;
- Untimely complaints filed more than 60 days after the alleged discriminatory acts;
- Complaints voluntarily withdrawn by the Complainant;
- Complaints in which the investigation has been impaired by the Town’s inability 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;
- 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 the 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. In such circumstances, the Complainant should be contacted and advised that their lack of cooperation has hindered the investigation. Furthermore, the Complainant must be advised that continued failure to cooperate may result in an administrative closure of the complaint without further investigation;
- Complaints transferred to another agency for investigation; and
- Complaints where the death of a Complainant makes it impossible to investigate the allegations fully or the death of the Complainant forecloses the possibility of relief because the complaint involved potential relief solely for the Complainant or injured party.

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

Appeals Procedures

The Complainant has the right to appeal to INDOT any determination that results in an unsubstantiated claim. The Town will convey to the Complainant the procedures for filing the appeal to INDOT along with the Letter of Findings. The procedure for filing an appeal with INDOT is:

- Complainant must submit the appeal in writing to the Title VI Coordinator within 14 calendar days of receipt of the Town's Letter of Findings.
- Complainant must cite in the appeal the specific portion(s) of the finding with which the Complainant disagrees and the reason(s) for the disagreement.
- The Town will forward the appeal and the record within seven (7) calendar days to INDOT for review.
- INDOT has 30 calendar days after the receipt of the appeal to complete its review.
- Written findings of INDOT are then sent to the Complainant and the Town Commissioners.

Confidentiality

In accordance with DOT Order 1000.12, the Town 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 Respondent or a third party the investigator must first obtain Complainant's written permission. Furthermore, the Town shall obtain a Complainant's written consent before providing a copy of the complaint to the Respondent or a third party.

Records

The Title VI Coordinator shall maintain all records of an investigation in a confidential area for three (3) years after the completion of the investigation.

Summary of Complaints Received

- As of March 1, 2017 there were no requests for language services.

Public Participation and Outreach

The Town's Title VI Coordinator will update the Title VI webpage as needed.

Huntertown, Indiana will make available a Voluntary Title VI Public Involvement Survey (Exhibit 9) available at all public meetings and hearings. The Presiding Officer is responsible for making an announcement at the beginning and at the end of the meeting or hearing informing the attendees of the purpose of the survey and request the attendees to complete the survey.

The completed surveys will be retained for three (3) years from the date of the meeting or hearing.

Title VI Civil Rights Compliance Reviews

Huntertown, Indiana performs annual reviews to determine overall compliance with Title VI of the Civil Rights Act of 1964, which prohibits discrimination against person(s) race, color, national origin, disability, religion, sex, sexual orientation, gender identity, age, low income status or limited English proficiency in programs or activities, receiving Federal financial assistance. Huntertown performs annual reviews through interviews and document reviews within each department. (See Exhibit 5 Compliance Review Form).

Limited English Proficiency (LEP) Plan

This Limited English Proficiency Plan has been prepared to address Huntertown, Indiana responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, U.S.C. 2010, and its implement regulations provide that no person shall be subjected to discrimination on the basis of race, color, national origin, disability, religion, sex, sexual orientation, gender identity, age, low income status or limited English proficiency under any program or activity that receives federal financial assistance.

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

In developing the plan while determining Huntertown's extent of obligation to provide LEP services, Huntertown undertook the U. S. Department of Transportation's four-factor analysis which considers the following factors:

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

Huntertown has a population of 5260 based on the 2011-2015 5-Year American Community Survey. The total population for Huntertown 5 years of age and older is 4834 based on the 2011-2015 5-Year American Community Survey. The 2011-2015 5-Year American Community Survey determined that 19 (0.39% of the Town's population) persons in Huntertown have limited English proficiency; that is, they speak English "not well" or "not at all". The Indo-European language was the largest non-English speaking language group. Based on the 2010-2014 5-Year American Community Survey there were 14 (0.29% of the Town's population) respondents age 5 and older identified as speaking the Indo-European language that spoke English "not well" or "not at all".

2. The frequency with which LEP individuals come in contact with a Town program, activity, or service.

Huntertown will be implementing the LEP Plan on January 1, 2018 therefore the Town will assess the frequency at which employees have or could have contact with LEP persons over the next year.

3. The nature and importance of the program, activity, or service provided by the Town to LEP community.

The majority of the population, 94.7% in the Town speak only English. Based on the 2011-2015 5-Year American Community Survey the largest geographic concentration of any one type of LEP individuals within Huntertown's service area is Spanish or Spanish Creole.

4. The resources available to the Town and overall cost to provide LEP assistance.

This will be a goal in the upcoming year for Huntertown to investigate and select a resource for interpreting and document translation service that best serves the needs of Huntertown.

Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Huntertown's programs and activities. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. Huntertown will determine when interpretation and/or translation are needed and are reasonable. How Huntertown staff may identify if an interpreter is needed or if an LEP person needs language assistance:

- Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events (Exhibit 10)
- Have Language Identification Flashcards (Exhibit 11) available at Town events near the registration table and at customer service areas easily accessible to the staff. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the time, but it will assist in identifying language assistance needs for future events.

Language Assistance Measures

Although there is a very low percentage in Hometown of LEP individuals, that is, persons who speak English “not well” or “not at all”, Hometown will strive to offer language assistance using the following measures:

- If an individual asks for language assistance and Hometown determines that the individual is an LEP person and if language assistance is necessary to provide meaningful access. Hometown has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.
- When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and access the language interpreting service provided to the staff.
- Hometown will periodically assess the need for language assistance based on requests for interpreters and/or translation.

Summary of Language Services requests 2017

- As of March 1, 2017 there were no requests for language services.

Title VI Goals

2017 Goals	Goal Date	Completion Date
Place the Title VI Implementation Plan and all Title VI forms on the Huntertown website	8/1/2017	
Train the Title VI Liaisons on the Title VI Program and LEP Plan	8/1/2017	
Incorporate a language service for all Departments to utilize for LEP persons	1/1/2018	
Identify sub-recipients	10/1/2017	
Provide Title VI training and/or information to the sub-recipients	11/1/2017	
Publish Title VI Statement annually in the local newspaper(s)	6/1/2017	
Review all programs for Title VI implications	12/1/2017	
Update Title VI plan as needed	12/31/2017	
Identify 2018 Goals	12/31/2017	
Identify 2017 Accomplishments	12/31/2017	

Title VI Reporting/Accomplishments

1. Completion of the Title VI Implementation Plan
2. Update of the ADA Transition Plan