

TOWN *of* WAKE FOREST



# Title VI

PROGRAM  
PLAN

ADOPTED DATE: May 21 2024  
EFFECTIVE DATE: June 1, 2024

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## **I. Introduction**

The purpose of the Town of Wake Forest Title VI Program Plan is to ensure that the Town is in compliance with the provisions of Title VI of the Civil Rights Act of 1964. The Town is a federal grant recipient, and therefore is required by the federal government to conform to Title VI of the Civil Rights Act of 1964 and its amendments. Title VI requires that no person in the United States, on the basis of race, color or national origin be denied the benefits of, or be subjected to discrimination, in programs, activities, and services receiving federal financial assistance. The Federal-Aid Highway Act of 1973 added the requirement that there be no discrimination on the grounds of sex. Additionally, the Civil Rights Restoration Act of 1987 defined the word “program” to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal financial assistance. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with limited English proficiency. Discrimination on the basis of gender, age, and disability is prohibited under related statutes. These Presidential Executive Orders and the related statutes fall under the umbrella of Title VI.

Federal-aid recipients, subrecipients, and contractors are required to prevent discrimination and ensure nondiscrimination in all their programs, activities, and services whether these programs, activities and services are federally funded or not. The Town of Wake Forest Title VI Coordinator is responsible for providing leadership, direction, and policy to ensure compliance with Title VI and environmental justice principles.

## **II. Nondiscrimination Policy**

It is the express policy of the Town of Wake Forest that no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under, any program or activity receiving federal funds on the grounds of race, color, national origin, sex, age, disability, or income, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, the Federal Aid Highway Act of 1973, Age Discrimination Act of 1975, the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Executive Order 12898 and Executive Order 13166.

It is also the express policy of the Town that no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Town program or activity, whether those programs, activities and services are federally funded or not, on the grounds of race, color, religion, limited English proficiency, sex, marital status, familial status, national origin, age, mental or physical disability, sexual orientation, gender identity, or income-level. See Appendix A, Nondiscrimination Policy Statement.

## **III. Nondiscrimination Notice**

The Town uses the general nondiscrimination policy to reflect the adopted policy and support all activities and services provided by the Town of Wake Forest. See Appendix B, Nondiscrimination Notice

## IV. Equal Employment Opportunity Statement

The Equal Employment Opportunity Statement is included on the Town's job application forms. See Appendix C, Equal Employment Opportunity Statement.

## V. Nondiscrimination Authorities

While Section II introduces legislation connected to Title VI, the following describes applicable legislation in which complaints will be reviewed against.

**A. Title VI of the Civil Rights Act of 1964 [Pub. L. 88-352 (1964), codified as 42 U.S.C. §§2000d through 2000d-4]**

Title VI of the Civil Rights Act of 1964 prohibits the discrimination in, or the denial of benefits under, any program or activity receiving federal financial assistance on grounds of race, color or national origin.

**B. The Civil Rights Restoration Act of 1987, [Pub. L. 100-259, Sec. 6 (1988), codified as 42 U.S.C. §2000d-4a]**

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms "programs or activities" to include all programs, activities, and services of federal aid recipients, subrecipients, and contractors, whether such programs, activities, and services are federally assisted or not.

**C. Federal Aid Highway Act of 1973, [Pub. L. 93-87 (1973), codified as 23 U.S.C. §324]**

The Federal Aid Highway Act of 1973 provides that no person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.

**D. Age Discrimination Act of 1975, [Pub. L. 94-135 (1975), codified as 42 U.S.C. §6102]**

The Age Discrimination Act of 1975 provides that no person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.

**E. Americans with Disabilities Act of 1990, Subchapter 2, Part A [Pub. L. 101-336 (1990); codified as 42 U.S.C. §§12131-12134]**

The Americans with Disabilities Act of 1990 provides that no qualified individual with a disability shall, by reason of such disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination by a department, agency, special purpose district, or other instrumentality of a state or a local government.

**F. Section 504 of the Rehabilitation Act of 1973 [Pub. L. 93-112 (1973), codified as 29 U.S.C. §794]**

Section 504 of the Rehabilitation Act of 1973 provides that no qualified handicapped person, shall, solely by reason of his/her handicap, be excluded from participation in, be denied the

benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.

#### **G. 23 CFR Part 200**

23 CFR 200 are administration regulations promulgated by the Federal Highway Authority that specify the Title VI implementation requirements for departments of transportation at state and local levels.

#### **H. 49 CFR Part 21**

49 CFR 21 are administration regulations promulgated by the US Department of Transportation that specify the Title VI implementation requirements for departments of transportation at state and local levels.

#### **I. Executive Order No. 12898**

Executive Order 12898 regards federal actions to address Environmental Justice in minority populations and low-income populations.

#### **J. Executive Order No. 13166**

Executive Order 13166 regards the improvement of access to services for persons with limited English proficiency (LEP).

## **VI. Definitions**

The following definitions apply to this Title VI Program Plan:

- **Affected Parties:** Persons protected against discrimination because of race, color, national origin, sex, age, disability, or income by the Title VI Requirements, and the Town of Wake Forest's Nondiscrimination Policy Statement.
- **Contractor or Consultant:** A person or entity who has entered into an agreement with the Town that is subject to the Title VI Requirements.
- **Environmental Justice:** Seeks equal protection from environmental and public health hazards for all people regardless of race, income, culture and social class. Additionally, environmental justice means that no group of people including racial, ethnic, or socioeconomic groups should bear a disproportionate share of the negative environmental consequences resulting from industrial, land-use planning and zoning, municipal and commercial operations or the execution of federal, state, local and municipal program and policies.
- **LEP Program:** The limited English proficiency program established by the Town to assist individuals who do not speak English as their primary language, and who therefore have limited ability to read, speak, or understand the English language. See Section VIII, J, Limited English Proficiency Program.
- **Locating and Siting Actions:** A recommendation by Town staff or decision by Town staff or the Board of Commissioners that will result in the construction of a public facility that could have adverse environmental impacts on the surrounding area.

- **Meaningful Access:** The provision of communicative assistance by the Town necessary to allow affected persons to participate in governmental programs, activities, and services.
- **Proposed Project:** A project that receives federal funds and is subject to the Title VI Requirements.
- **Subrecipient:** A person or entity that receives federal funds from the Town to be used by the entity to further the objectives of the federal grant. The Town is the recipient of the grant, and the person or entity is a subrecipient of those grant funds. An example of a subrecipient relationship would be where the Town grants federal funds to a non-profit corporation that the corporation uses to provide assistance for low-income households to pay utility bills.
- **Title VI Assurances:** Conditions imposed upon contractors or subrecipients as a result of federal funding being directly or indirectly provided to the contractor or subrecipient.
- **Title VI Requirements:** The nondiscrimination provisions contained in Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, the Federal Aid Highway Act of 1973, Age Discrimination Act of 1975, the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Executive Order 12898, and Executive Order 13166.

## VII. Title VI Staffing and Organization for Implementation

### A. Designation of Title VI Coordinator

The Town Manager, as part of this Plan, appoints the Organizational Performance Director as the Title VI Coordinator.

### B. Title VI Coordinator

The Title VI Coordinator plays a lead role in the development and implementation of the Title VI Plan. The Coordinator provides leadership and guidance to ensure nondiscrimination in Town programs, activities, and services, and promotes the participation of all people regardless of race, color, national origin, sex, age, disability and socioeconomic status.

The Title VI Coordinator has overall program responsibility for Title VI compliance including:

- Processing and researching complaints regarding compliance with this Title VI Program Plan that are received by the Town.
- Identifying and addressing discrimination when found to exist.
- Collecting statistical data of participants in and beneficiaries of Town programs, activities, and services.
- Reviewing and updating the data compilation processes regularly to ensure the data is sufficient to meet the requirements of this Program Plan.
- Reviewing Town programs, activities, and services receiving federal funds in coordination with Department Liaisons to ensure compliance with Title VI Requirements.
- Soliciting the LEP community annually to identify language assistance needs.

- Providing training programs related to Title VI Requirements for Town staff who are responsible for Title VI compliance, and for contractors or subrecipients who are subject to Title VI Requirements.
- Developing information regarding this Title VI Program Plan for dissemination to the general public and, where appropriate, using the LEP Program to ensure dissemination of the information to affected populations.
- Ensuring all individuals and groups have meaningful access to and awareness of Town programs, activities, and services.
- Identifying deficiencies in compliance with the Title VI Requirements and making recommendations for remedial actions to be taken to promptly resolve such deficiencies.
- Making recommendations on ways to achieve compliance with Title VI Requirements.
- Preparing an annual Title VI Program Plan Report.
- Updating Title VI Program Plan at least every three years to ensure compliance.
- Reviewing surveys, questionnaires, and other outreach material for compliance with Appendix E, Statistical Data Collection Standards, and the Town Communications Plan, a guide for how the Town will sustain its efforts to engage diverse community members.

### **C. Departmental Liaisons**

Department Liaisons are responsible for the day-to-day compliance with the Title VI Program Plan within their departments. The Title VI Coordinator shall keep on file an accurate and updated list of all Department Liaisons. Department Liaisons are responsible for:

- Collecting statistical data regarding participants in and beneficiaries of federally funded programs, activities, and services in accordance with Town Plans and policies.
- Assisting the Title VI Coordinator in gathering and organizing data for the Title VI Program Plan Report.
- Conducting post-grant approval reviews of Town programs, activities, and services (e.g., roadway location, design and relocation, and persons seeking contracts with the Town), for compliance with the Title VI Requirements.
- Notifying Affected Parties of public meetings or hearings regarding a Proposed Project and ensure that meetings and hearings are accessible to all Affected Parties.

## **VIII. Title VI Program Components**

### **A. Nondiscrimination Policy**

The Town adopts within this plan a Nondiscrimination Policy Statement. See Appendix A.

### **B. Nondiscrimination Notice**

The Town will publish and post a Nondiscrimination Notice. See Appendix B and



### **C. Elimination of Discrimination**

The Town will continue its practice of identifying discrimination based on race, color, religion, sex, marital status, familial status, national origin, age, mental or physical disability, sexual orientation, gender identity and source of income, and where such discrimination is found to exist, implementing programs or practices to eliminate the discrimination. Programs include, but are not limited to, hiring Minority/Women/Disadvantaged Business Enterprises (DBE) firms, providing translations through the LEP Program, and conducting public outreach and involvement in Town projects.

### **D. Public Dissemination of Information**

The Title VI Coordinator shall assist Town staff in the creation and dissemination of Title VI Program information to Town employees, subrecipients, contractors, Affected Parties, and the general public. Public dissemination efforts may include:

- Posting public statements setting forth the Town's nondiscrimination policy.
- Inclusion of Title VI Assurances in Town contracts and grants.
- Publishing the Nondiscrimination Policy Statement on the Town's website.
- Including the Nondiscrimination Notice and the Nondiscrimination Policy Statement into all adopted plans and program documents.

### **E. Title VI Assurances in Contracts and Grants**

Contracts and procurement are integrated into each department. Staff will ensure that all federally funded contracts administered by the Town contain Title VI Assurances. In the event that the Town distributes federal funds to another entity through grants or other agreements, the Town employee administering the grant or agreement will ensure that such grants and agreements contain the Title VI Assurances. The employee administering the grant will monitor the performance of the contract or grant for compliance. The Title VI Coordinator and Town employee will coordinate efforts to ensure that the requirements of Title VI are met throughout the entire contracting and grant performance process.

### **F. Data Collection**

Statistical data on Affected Parties will be compiled by each Department Liaison and provided to the Title VI Coordinator. See Appendix E for data collections requirements.

### **G. Training Program**

Required annual training will be made available to Department Heads, Department Liaisons, and Town staff administering federally funded projects. The Title VI Coordinator is responsible for providing this training. Specifically, this training will provide comprehensive information on:

- The Title VI requirements and its application to specific programs, activities, and services.
- Assistance on the identification of Title VI issues.

- An overview of the complaint process.

## **H. Site and Facility Location**

The Town shall not make selection of a site or location of a facility for participants in and beneficiaries of the Town's federal aid programs if that selection could exclude individuals from participation in, or deny them benefits of, or subject them to discrimination on grounds of race, color or national origin, or could substantially impair the accomplishment of the objectives of the nondiscrimination policy.

## **I. Environmental Justice in Minority and Low-Income Populations**

In accordance with Executive Order 12898, titled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," the Town will develop strategies to review, consider, and address disproportionately high and adverse human health or environmental effects on minority and low-income populations, to promote nondiscrimination in federal programs that affect human health and the environment, and provide minority and low-income communities access to public information and public participation

## **J. Limited English Proficiency Program**

In accordance with Executive Order 13166, the Town has established a LEP program. Approximately 1.91% of residents in Wake Forest primarily speak a language other than English<sup>1</sup>. About 44% of these residents speak Spanish. The Town of Wake Forest will review demographic data annually and solicit data from the LEP community to identify language assistance needs within its service areas, utilizing US Census data. At this time, the Town of Wake Forest has or will implement the following LEP measures:

- Translation feature on Town website.
- Translation feature on IDT.
- Title VI Nondiscrimination Notice (see Appendix B) translated into Spanish.
- Title VI Complaint Form translated into Spanish.
- Bus System Map and Schedules translated into Spanish.
- Code Enforcement and Notification Forms translated into Spanish
- Various Public Works notifications/pamphlets translated into Spanish

Staff will continue to monitor and evaluate the Town's efforts based on requests for LEP assistance and make adjustments or changes as needed. There are several measures that can be taken to identify persons who may need language assistance in our service area, with emphasis on our

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<sup>1</sup> US Census: 2018: ACS 5-Year Estimates

primary group requiring help. This list below identifies potential opportunities:

- Send out notifications in Spanish of upcoming events/meeting(s).
- Select locations that may be more convenient for LEP persons.
- Train staff to utilize translation apps to support LEP persons during regular customer service provided by Town staff.
- Set-up a sign-in table and have a staff member greet and briefly speak to each attendee in order to informally gauge his/her ability to speak and understand English when open houses or public meetings are held.
- Have the Census Bureau's "I Speak" card at various events. Although staff may not be able to provide translation assistance at the time, the cards are an excellent tool to identify language needs for future events/meetings.
- Post a notice of available language assistance at open houses/public meetings to encourage LEP persons to self-identify.
- Examine record requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.
- Survey staff who have contact with LEP individuals to record language assistance requests.

## **IX. Title VI Program Plan Annual Review**

The Title VI Coordinator will conduct an annual Title VI Program Plan review to assess each Department's effectiveness in ensuring compliance with the Title VI Requirements. This review will include:

- An evaluation of administrative procedures and staffing.
- A review of operational guidelines for Town staff, contractors and subrecipients.
- An assessment of resources available to ensure compliance with the Title VI Requirements.

## **X. Title VI Program Plan Report**

The Title VI Coordinator shall prepare an annual Title VI Program Plan report that documents progress, accomplishments, impediments, and goals in fulfilling this Title VI Program Plan annually. This Report shall be forwarded to the Town Manager on or before July 31<sup>st</sup> of each year and will be based on the data compiled by the Department Liaison and the Title VI Program Plan Annual Review. (See Section IX). The Report shall include:

- A list of programs, activities, and services subject to the Title VI Requirements.
- A general assessment of the Title VI compliance by Department.
- A summary of efforts made to engage minority, low-income, and LEP populations in public outreach efforts by Department, including statistical data. (See Appendix E, Statistical Data

Collection Standards).

- A summary of contracted DBE firms.
- A summary of any complaints of violations of the Title VI requirements and how each complaint was resolved.
- A summary of Title VI training, including attendees.
- A list of recommended changes to the programs, activities, and services subject to the Title VI requirements.
- A summary of any significant actions planned for the ensuing year.

## **XI. Prevention**

### **A. Internal Prevention**

The Town will actively seek to prevent Title VI deficiencies or irregularities. In taking such action, the Title VI Coordinator, in coordination with Department Heads, will create an action plan within 90 days of the date the need for preventive or remedial action is identified. The Title VI Coordinator is responsible for retaining a copy of the action plan.

### **B. Town Contractor Prevention**

The Town will actively seek to prevent Title VI deficiencies or irregularities with entities hired to perform work on behalf of the Town. When a Wake Forest staff member reasonably believes a contractor or subrecipient has violated a Title VI Requirement, the Department Head will follow the following process:

- Town employee administering the grant or agreement and the Department Head will meet with the Title VI Coordinator.
- The Title VI Coordinator will meet with the contractor or subcontractor to conduct an initial review of the facts and determine if a violation of the Title VI Requirements has occurred or is occurring.
- If, after the initial review, the Title VI Coordinator concludes that the contractor or subrecipient has violated the Title VI Requirements, the contractor or subrecipient will be issued a notice to comply and given a reasonable time, not to exceed 60 days, to voluntarily correct noncompliance.
- The Title VI Coordinator will provide technical assistance to the contractor or subrecipient to obtain voluntary compliance with the Title VI Requirements.
- A follow-up review will be conducted within 90 days of the date the notice to comply was provided to the contractor or subrecipient to ensure that the violation of the Title VI Requirements has been corrected. If after the review, the contractor or subrecipient has failed to correct the violation, the Town may take appropriate action (e.g., withhold funds, cancel contract) required to comply with the Town's obligation under the federal grant.
- When a contractor or subrecipient has failed or has refused to comply with Title VI

requirements, the Department Head will submit two copies of the file to the appropriate state or federal agency.

## XII. Complaint Process

The Title VI Coordinator is responsible for processing discrimination complaints filed under Title VI of the Civil Rights Act of 1964 and related nondiscrimination laws. Participants and beneficiaries of programs, activities, and services administered or funded by the Town of Wake Forest who feel they have been discriminated against based on race, color, national origin, limited English language proficiency, income-level, sex, sexual orientation, gender identity or expression, age, or disability have a right to file a complaint. Complaints of alleged discrimination will be investigated by the appropriate authority.

Note: Religion is only covered under NCDOT's Right of Way program (Fair Housing) and programs funded by the Federal Aviation Administration (FAA) or Federal Transit Administration (FTA).

### A. Filing of Complaints

- **Applicability:** These complaint procedures apply to Town of Wake Forest programs, activities, and services. Note: Title VI does not include internal complaints related to Equal Employment Opportunity (EEO).
- **Eligibility:** Any person or class of persons who believes they have been subjected to discrimination based on race, color, national origin, limited English language proficiency, income level, sex, pregnancy, sexual orientation, gender identity or expression, age, National Guard or veteran status, or disability (and religion, where applicable) may file a written complaint with the Town of Wake Forest's Title VI Coordinator.
- **Filing Options and Time Limits:** Complaints may be filed by the affected individual(s) or a representative and should be filed no later than 180 calendar days after the following:
  - The date of the alleged act of discrimination,
  - The date when the person(s) became aware of the alleged discrimination, or
  - Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

Title VI and related discrimination complaints may be submitted to the following entities. (Note: agency names and address as of January 2021 and are subject to change).

<b>Agency</b>	<b>Contact Information</b>
<b>Town of Wake Forest</b>	Title VI Program Coordinator 301 South Brooks Street Wake Forest, NC 27587 Phone: 919-435-9415
<b>North Carolina Department of Transportation</b>	Office of Civil Rights External Civil Rights 1511 Mail Service Center Raleigh, NC 27699-1511 Phone: 919-508-1808 or toll-free 800-522-0453
<b>US Department of Transportation</b>	Departmental Office of Civil Rights External Civil Rights Programs Division 1200 New Jersey Avenue, SE Washington, DC 20590 Phone: 202-366-4648
<b>Federal Highway Administration</b>	Office of Civil Rights 1200 New Jersey Avenue, SE 8th Floor, E81-105 Washington, DC 20590 Phone: 202-366-0693
<b>Federal Highway Administration</b>	North Carolina Division Office 310 New Bern Avenue, Suite 410 Raleigh, NC 27601 Phone: 919-747-7010
<b>Federal Transit Administration</b>	Office of Civil Rights ATTN: Complaint Team East Bldg. 5th Floor – TCR 1200 New Jersey Avenue, SE Washington, DC 20590
<b>Federal Motor Carrier Safety Administration</b>	Office of Civil Rights 1200 New Jersey Avenue, SE Washington, DC 20590 Phone: 202-366-8810
<b>Federal Aviation Administration</b>	Office of Civil Rights 800 Independence Avenue, SW Washington, DC 20591 Phone: toll-free 888-954-8688
<b>US Department of Justice</b>	US Department of Justice Civil Rights Division 950 Pennsylvania Avenue, NW Office of Assistant Attorney General, Main Washington, DC 20530 Phone: 202-514-3847

## **B. Complaint Receipt and Response**

- The Title VI Coordinator will provide written acknowledgement via registered mail of your

complaint within ten calendar days.

- The Town will review your complaint upon receipt to ensure the required information was provided, the complaint was timely filed, and jurisdictional requirements were met.
  - If the complaint is complete and no additional information is needed, the Title VI Coordinator will send you a letter of acceptance as well as a Complainant Consent/Release Form.
  - If the complaint is incomplete, you will be contacted in writing to obtain the needed information. Note: Failure to respond and/or provide the requested information within 15 calendar days may be considered good cause for a determination of no investigative merit.
- Within 15 calendar days of receiving your complaint, the Town will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five days of this decision, the Town will notify you and Respondent (the person(s) against whom you have filed the complaint) via registered mail, stating the decision.
  - If the decision is not to investigate the complaint, the notification shall specifically state the reasons for the decision.
  - If the decision is to investigate the complaint, the notification shall state the grounds of the Town's jurisdiction and require the complainant's full cooperation in assisting the investigator.
  - Interviews may be recorded during the investigation. Consent to record may be required if the interviewee is located outside of North Carolina.
- The Town will attempt to resolve all discrimination complaints within 60 days of accepting the complaint for investigation. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation between the affected parties and the Town staff may be utilized for resolution.
  - If a party is not satisfied with the results of the investigation or the resolution of the complaint, the party may appeal the decision to the Town Manager. The Title VI's decision will be upheld unless the Town Manager finds that it constitutes an abuse of discretion.
  - Following the appeal decision, the Town Manager shall inform the Complainant of the right to file a complaint directly with the Department of Justice by filling out their complaint form or calling the Title VI Hotline: 1-888-TITLE-06. The appeal must be filed by the deadline established by the Department of Justice.

## Appendix A. Nondiscrimination Policy Statement

It is the policy of the Town of Wake Forest to ensure that no person shall, on the grounds of race, color, religion, limited English proficiency, sex, marital status, familial status, national origin, age, mental or physical disability, sexual orientation, gender identity, or income-level, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Town of Wake Forest program or activity, including, where applicable, religion, as provided by Title VI of the Civil Rights Act of 1964 and other pertinent nondiscrimination authorities.

The following practices are hereby prohibited throughout the Town of Wake Forest to comply, at a minimum, with Title VI and related requirements:

- Denying to an individual any standard service, access to Town owned or operated facilities, financial aid, or other program benefit without good cause.
- Providing any service, financial aid, or other benefit to a person which is distinct in quantity or quality, or is provided in a different manner, from that provided to others under the program.
- Subjecting a person to segregation or separate treatment in any part of a program.
- Restricting in the enjoyment of any advantages, privileges, or other benefits enjoyed by others.
- Denying an individual access to Town facilities.
- Applying different standards, criteria, or other requirements for admission, enrollment, or participation in planning, advisory, contractual, or other integral activities.
- Using acts of intimidation or retaliation, including threatening, coercing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by any pertinent nondiscrimination law, or because s/he has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing.
- Allowing discrimination in any employment resulting from a program, the primary purpose of which is to provide employment.



## Appendix B. Nondiscrimination Notice

The Town of Wake Forest, pursuant to its policy to comply with Title VI of the Civil Rights Act of 1964 and other pertinent nondiscrimination authorities, will not exclude from participation in, deny the benefits of, or subject to discrimination any person based on race, color, religion, limited English proficiency, sex, marital status, familial status, national origin, age, mental or physical disability, sexual orientation, gender identity, or income-level, under any programs, activities, and services conducted or funded by the Town of Wake Forest.

Any person who believes they have, individually or as a member of any specific class of persons, been wronged by a discriminatory act (action or inaction) of the Town of Wake Forest or its funding recipients, has the right to file a complaint with the Town of Wake Forest. Complaints may be filed by the affected individual(s) or a representative and should be filed no later than 180 calendar days after the following:

- The date of the alleged act of discrimination,
- The date when the person(s) became aware of the alleged discrimination, or
- Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

All complaints should be signed and include contact information. You may file a written complaint with the Town of Wake Forest Title VI Coordinator at 301 South Brooks Street, Wake Forest NC 27587 or call 919-435-9415. For instructions on how to file a complaint or additional information regarding the Town of Wake Forest's nondiscrimination obligations, please visit [www.wakeforestnc.gov/TitleVI](http://www.wakeforestnc.gov/TitleVI) or contact:

Town of Wake Forest  
ATTN: Lisa Hayes, Organizational Performance Director  
301 South Brooks Street  
Wake Forest, NC 27587-2901  
Phone: 919-463-9415  
Email: [lhayes@wakeforestnc.gov](mailto:lhayes@wakeforestnc.gov)

Anyone with a hearing or speech impairment may use Relay NC, a telecommunications relay service, to call the Town of Wake Forest. Relay NC can be accessed by dialing 711 or 1-877-735-8200.

ATTENTION: If you speak a language other than English, the following language assistance services are available to you, free of charge. Qualified interpreters and information written in other languages. Call 1-800-522-0453.

El Town of Wake Forest, conforme a su política de cumplimiento con el Título VI de la ley de Derechos Civiles del 1964 y otras autoridades pertinentes no discriminatorias, no excluirá de participación en, o negará beneficios de, o será sujeto a discriminación a ninguna persona basado en su raza, color, religión, dominio limitado del inglés, sexo, estatus matrimonial, estatus familiar, origen nacional, edad, incapacidad mental o física, orientación sexual, identificación de género, o nivel de ingreso, bajo ningún programa, actividades y servicios dirigidos o fundados por el Town of Wake Forest.

Cualquier persona que entienda ha sido, individualmente o como miembro de cualquier clase específica de persona, afectado por un acto discriminatorio (acción o inacción) por el “Town of Wake Forest” o sus destinatarios financiados, tiene el derecho de presentar una queja con el “Town of Wake Forest”. Las quejas escritas pueden ser sometidas por el individuo(s) afectado o un representante dentro de 180 días calendario luego de lo siguiente:

- La Fecha de la alegada discriminación,
- La fecha cuando la persona (s) se percata de la alegada discriminación,
- Donde ha habido un curso de conducta continuo, la fecha en la cual la conducta a descontinuado o la última instancia de la conducta.

Toda queja escrita debe incluir firma e información de contacto. Usted puede presentar una queja escrita a la dirección 301 South Brooks Street, Wake Forest NC 27587, dirigido al “Town of Wake Forest Title VI Coordinator” o llamar al (919)-435-9415. Para más información e instrucciones de como presentar una queja relacionado con las obligaciones no discriminatorias del Town of Wake Forest, puedes visitar [www.wakeforenstnc.gov/TitleVI](http://www.wakeforenstnc.gov/TitleVI) o contactar:

Town of Wake Forest  
ATTN: Lisa Hayes, Organizational Performance Director  
301 South Brooks Street  
Wake Forest, NC 27587-2901  
Phone: 919-463-9415  
Email: [lhayes@wakeforestnc.gov](mailto:lhayes@wakeforestnc.gov)

Personas con discapacidad auditiva o del habla pueden utilizar los Servicios “Relay NC telecommunications relay service”, para llamar al Town of Wake Forest. Puedes acceder al servicio llamando al 711 o 1-877-735-8200.

**ATENCION:** Si habla un idioma distinto del inglés, los siguientes servicios de asistencia de idiomas están disponibles para usted, de forma gratuita. Intérpretes cualificados e información escrita en otros idiomas. Llame al 1-800-522-0453.

## **Appendix C. Equal Employment Opportunity Statement**

The Town of Wake Forest is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, creed, color, religion, alienage or national origin, ancestry, citizenship status, age, disability or handicap, sex, marital status, military status, veteran status, sexual orientation, genetic information, or any other characteristic protected by applicable federal, state or local laws. Our management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, and general treatment during employment.

## Appendix D. Complaint Form

The Title VI Coordinator has the responsibility of addressing Title VI/Civil Rights inquiries and complaints against the Town of Wake Forest. The form is located online at [www.wakeforenstnc.gov/TitleVI](http://www.wakeforenstnc.gov/TitleVI).

## Appendix E. Statistical Data Collection Standards

Standards for statistical data collection are as follows:

### A. Surveys

All digital and hard copy surveys shall include the following questions:

Question	Responses
Select if you rent or own:	<ul style="list-style-type: none"> <li>• Rent</li> <li>• Own</li> <li>• Prefer not to answer</li> </ul>
Do you have a disability?	<ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• Prefer not to answer</li> </ul>
Select the gender you identify with:	<ul style="list-style-type: none"> <li>• Male</li> <li>• Female</li> <li>• Non-binary</li> <li>• Prefer not to answer</li> </ul>
Select your age:	<ul style="list-style-type: none"> <li>• Under 18</li> <li>• 18-24</li> <li>• 25-34</li> <li>• 35-44</li> <li>• 45-54</li> <li>• 55-64</li> <li>• 65-74</li> <li>• 75 or older</li> <li>• Prefer not to answer</li> </ul>
How well do you speak English?	<ul style="list-style-type: none"> <li>• Very well</li> <li>• Well</li> <li>• Okay</li> <li>• Very little</li> <li>• Not at all</li> <li>• Prefer not to answer</li> </ul>
Which category best describes you?	<ul style="list-style-type: none"> <li>• White (e.g., German, Irish, English, Italian, Polish, French, etc.)</li> <li>• Hispanic, Latino or Spanish origin (e.g., Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian, etc.)</li> </ul>

Question	Responses
	<ul style="list-style-type: none"> <li>• Black or African American (e.g., African American, Jamaican, Haitian, Nigerian, Ethiopian, Somalian, etc.)</li> <li>• Asian (e.g., Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese, etc.)</li> <li>• American Indian or Alaska Native (e.g., Navajo nation, Blackfeet tribe, Mayan, Aztec, Native Village or Barrow Inupiat Traditional Government, Nome Eskimo Community, etc.)</li> <li>• Middle Eastern or North African (e.g., Lebanese, Iranian, Egyptian, Syrian, Moroccan, Algerian, etc.)</li> <li>• Native Hawaiian or Other Pacific Islander (e.g., Native Hawaiian, Samoan, Chamorro, Tongan, Fijian, etc.)</li> <li>• Some other race, ethnicity or origin</li> <li>• Prefer not to answer</li> </ul>
What language do you speak at home? (open-ended)	
Select your highest level of education attainment:	<ul style="list-style-type: none"> <li>• Some high school</li> <li>• High school graduate</li> <li>• Some college</li> <li>• Associate degree</li> <li>• Bachelor's degree</li> <li>• Master's degree or higher</li> <li>• Prefer not to say</li> </ul>
What is your approximate annual household income?	<ul style="list-style-type: none"> <li>• Less than \$12,000</li> <li>• \$12,000 - \$19,999</li> <li>• \$20,000 - \$30,999</li> <li>• \$31,000 - \$46,999</li> <li>• \$47,000 - \$69,999</li> <li>• \$70,000 - \$93,999</li> <li>• \$94,000 - \$117,999</li> <li>• \$118,000 or greater</li> <li>• Prefer not to answer</li> </ul>
How did you hear about this survey?	<ul style="list-style-type: none"> <li>• Email</li> <li>• Mail</li> <li>• Social media</li> </ul>

Question	Responses
	<ul style="list-style-type: none"> <li>• Newsletter</li> <li>• Flyer</li> <li>• Phone banking</li> <li>• Project website</li> <li>• Friend/Neighbor told me about it</li> <li>• Community organization leader told me about it</li> <li>• Other</li> <li>• Prefer not to answer</li> </ul>

**B. Methods for Identifying Affected Populations**

The Town will develop a method for identifying affected populations and update after each decennial census.