

# TIPTON COUNTY TITLE VI IMPLEMENTATION PLAN

Adopted by the Tipton County Board of Commissioners on August 25<sup>th</sup>, 2025

#### TABLE OF CONTENTS

INTRO	DUCTION
TITLE	/I NON-DISCRIMINATION & POLICY
TIPTOI	N VI ASSURANCES
TIPTOI	N COUNTY'S ORGANIZATION CHART
OVER	/IEW OF TIPTON COUNTY'S TITLE VI PROGRAM
1.	DATA COLLECTION, ANALYSIS, REPORTING
2.	complaints of a complaint
3.	ENVIRONMENTAL JUSTICE
4.	LIMITED ENGLISH PROFICIENCY (LEP)
5.	NONDISCRIMINATION & ACCESSIBILITY TRAINING
6.	PUBLIC INVOLVEMENT
7.	REVIEW OF PROGRAM AREA
APPEN	IDIX: FORMS
a)	Assurances
b)	Complaint Policy
c)	Complaint Log
d)	External Complaint Form
e)	Voluntary Involvement Survey
f)	I-Speak Cards

#### **INTRODUCTION:**

This Title VI Implementation Plan is a part of the Tipton County's continual and ongoing effort to proactively meet and exceed the minimum compliance requirements established under Title VI of the Civil Rights Act of the 1964 (Title VI) 49CFR § 26, and the related anti-discrimination statutes and regulations. With this Implementation Plan, Tipton County seeks to provide continued transparency, clarity and technical guidance for internal and external constituents regarding its Title VI program.

#### TIPTON COUNTY TITLE VI NON-DESCRIMINATION NOTICE & POLICY

Tipton County values each individual's civil rights and wishes to provide equal opportunity and equitable service for the citizens of this county. As a recipient of federal funds, Tipton County conforms 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 form Tipton County on the grounds of race, color, age, sex, sexual orientation, gender identity, disability, nation origin, religion, income status or limited English proficiency. Tipton County further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, regardless of whether those programs and activities are federally funded.

It is the policy of Tipton County to comply with Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e; Age discrimination Act of 1975, 42 U.S.C. §§ 6101-6107; Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 U.S.C. §§ 4601-4655; 1973 Federal Aid Highway Act, 23 U.S.C. § 324; Title IX of the Education Amendments of 1972, Pub. L. No. 92-318, 86 Stat. 235; Section 504 of the Rehabilitation Act of 1973., 29 U.S.C. §§ 701 et seq.; Civil Rights Restoration Act of 1987, Pub. L. No. 100-259, 102 Stat. 28; Americans with Disabilities Act of 1990, 42 U.S.C. §§ 12101 et seq.; Title VIII of the Civil Rights Act 1968, 42 U.S.C. §§ 3601-3631; Exec. Order No. 12898, 59 Fed. Reg. 7629 (1994) (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations); and Exec. Order No. 13166, 65 Fed. Reg. 50121 (2000) (Improving Access to Services for Persons with Limited English Proficiency).

The Civil Rights Restoration Act of 1987, Pub. L. No. 100-259, 102 Stat. 28, broadened the scope of Title Vi coverage by expanding the definition of terms "programs or activities" to include all programs or activities of federal-aid recipients, sub recipients and contractors/consultants, regardless of whether such programs and activities are federally assisted.

Pursuant to the requirements of Section 504 of the Rehabilitation Act of 1973, Pub. L. No. 93-112, 87 Stat. 355, Tipton County hereby gives assurance that no qualified disabled person shall, solely by reason of disability, be excluded from participation in, be denied the benefits of or otherwise be subjected to discrimination, including discrimination in employment, under any program or activity that receives or benefits from this federal financial assistance.

Tipton County also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. In addition, Tipton County will take reasonable steps to provide meaningful access to services for persons with limited English proficiency (LEP). Tipton County will, where necessary and appropriate, revise, update and incorporate nondiscrimination requirements into appropriate manuals, directives and regulations.

Whenever Tipton County distributes federal-aid funds to a second-tier sub recipient, Tipton County will include Title VI language in all written agreements.

The following individual has been identified as Tipton County's Title VI and ADA Coordinator and is responsible for initiating and monitoring Title VI activities, preparing reports and performing other responsibilities, as required by 23 C.F.R. § 200 and 49 C.F.R. § 21.

Sherri Crawford
ADA / Title VI Coordinator
555 Market Road
Tipton, IN 46072
(765) 675-4508
scrawford@tiptoncounty.in.gov

Tipton County affirms its commitment to nondiscrimination annually by publishing its Annual Title VI Implementation Plan and reaffirming its Assurances of Nondiscrimination, incorporated herein (see next page).

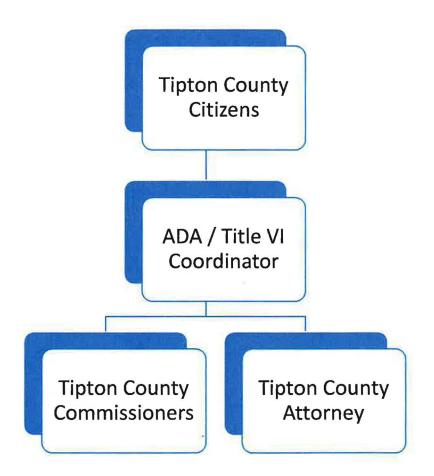
#### TITLE VI ASSURANCES

County. Tipton County has implemented this plan by majority vote in the regular scheduled Commissioner's meeting onAugust 25 <sup>th</sup> , 2025 And it is effective for plan year 2025-2026. This plan will be renewed before October 1 <sup>st</sup> , 2025.					
Signed by: Sherie Grawford Date: 8-25-25					
Name/Title: ADA/Title VI Coordinator					

Fully executed Assurances are included in Appendix A and integrated into this document. This Title VI Implementation Plan has been adopted, implemented and is being adhered to by Tipton

The individual above is a duly authorized representative of Tipton County.

## TIPTON COUNTY ORGANIZATION AND STAFFING FOR COMPLAINTS



## TIPTON COUNTY OVERVIEW OF TITLE VI PROGRAM: Data Collection, Analysis & Reporting

The type of data collected is dependent on the program area's objective. Tipton County collects various types of data to ensure compliance with Title VI. Some information is collected for a period of time with the objective of determining what data needs to be collected.

- Complaints received, logged, processed and investigated by Tipton County
- Environmental Justice analysis and reports
- Limited English Proficiency reports
- Title VI Training
- Public Involvement Survey
- Records of meeting minutes and discussion relate to Title VI

#### COMPLAINTS OF DISCRIMINATION

#### How to file a complaint:

While a Complainant may preliminarily submit his or her complaint by mail, facsimile, or email to the Title VI Coordinator, a signed, original copy of the complaint must be mailed to the Title VI Coordinator to officially begin the complaint process. Any person with a disability may request to file his or her complaint using an alternative format. Tipton County does not require a Complainant to use the Tipton County complaint form when submitting his or her complaint but must have all information requested on the form included in his or her complaint.

#### Direct all complaints of discrimination pursuant to Title VI to:

Sherri Crawford
ADA / Title VI Coordinator
555 Market Road
Tipton, IN 46072
scrawford@tiptoncounty.in.gov
765-675-4508 office

#### **ELEMENTS OF A COMPLETE COMPLAINT**

A complaint must be both written and signed to be complete. Verbal complaints must be reduced to writing and provided to the Complainant for confirmation, review and signature before processing. The Complaint form is available for download from the Tipton County website at: <a href="https://www.tiptongov.com">www.tiptongov.com</a>

Additionally, a complaint must include 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 discrimination on the basis of race, color, national origin, sex, age or disability) and the date of the occurrence.

#### PROCESSING COMPLAINTS

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

- The Title VI Coordinator will review the complaint upon receipt to ensure that all required information is provided, the complaint meets the filing deadline date which is 180 days from the date the alleged discriminatory act occurred and falls within the jurisdiction of the County.
- The Title VI Coordinator will then investigate the complaint. If the complaint is against the County, then the Tipton County Board of Commissioner's or their designee will investigate the complaint. Additionally, a copy of the complaint will be forwarded to the County Attorney.
- If the complaint warrants a full investigation, the Complainant will be notified in writing by certified mail. This notice will name the investigator and/or investigating agency.
- The party alleged to have acted in a discriminatory manner will also be notified by certified mail as of the complaint. The letter will also include the investigator's name and will request that this party be available for an interview.
- Any comments or recommendations from legal counsel will be reviewed by the Title VI Coordinator and the Board of Commissioner's.
- Once the County has investigated the report findings, the County will adopt a final resolution.
- If the complainant is not satisfied with the results of the investigation of the alleged discriminatory practice(s), he/she shall be advised of their right to appeal the County's decision. Appeals must be filed within 180 days after the County's resolution. Unless new facts not previously considered come to light, reconsideration of the County's determination will not be available.
- The foregoing complaint resolution procedure will be implemented in accordance with the Department of Justice guidance manual entitled "Investigation Procedures Manual for the Investigation and Resolution of Complaints Alleging Violations of Title VI and Other Nondiscrimination Statues," available online at:
  - http://www.justice.gov/crt/about/cor/Pubs/manuals/complain.pdf

#### **ENVIRONMENTAL JUSTICE ANALYSIS & REPORTS**

In accordance with Title VI of the Civil Rights Act of 1964, each Federal agency shall ensure that all programs or activities receiving Federal financial assistance that affect human health or the environment do not directly, or through other arrangements, use criteria, methods, or practices that discriminate on the basis of race, color, or national origin. Part of Title reads, "No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance."

The three fundamental environment justice (EJ) principles are:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

Tipton County is committed to these three environmental justice principles in all work that the County performs.

#### LIMITED ENGLISH PROFICIENCY (LEP) POLICY

On August 11, 2000, the President signed an executive order, Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency (LEP), to clarify Title VI of the Civil Rights Act of 1964. It has as its purpose, to ensure meaningful access to programs and services to otherwise eligible persons who are not proficient in the English language. In addition, The US Department of Transportation published Policy Guidance Concerning Recipients' responsibilities to Limited English Proficient Person in the December 14, 2005 Federal Register. This guidance outlines the following four factors that the County uses to access the LEP populations in Tipton County.

- 1. The number and proportion of LEP persons eligible to be served or likely to be encountered by the County.
- 2. The frequency with which LEP individuals come into contact with the program, activity or service.
- 3. The nature and importance of the program, activity, or service provided by the program.
- 4. The resources available to the County and costs.

In addition, Tipton County has not implemented the safe harbor provision whereby it identifies and translate all vital documents into any language where the 5% threshold is met whereby 5% or more of the population in the county both:

- Does not speak English very well AND
- Primarily speaks another specific language as identified in current census data or other publicly available records.

#### SUMMARY OF THE FOUR FACTOR ANALYSIS

The number and proportion of LEP persons eligible to be served or likely to be encountered by the County can only be estimated until the actual number of persons who can speak English less than "very well" are documented as needing assistance by County Staff. With this Title VI Plan being in early development stages and considered a document that may need regular updates, US Census

Bureau information is being used at this time. The total population is provided below to show general distribution of race and ethnicity in the community. The estimated number of persons that may not speak English "very well" is following in the US Census Bureau 2006-2010 American Community Survey.

## Factor 1: The U.S. Census Bureau provides statistics from 2020 for Tipton County as follows:

Total population = 15,361

Population percentage by Race:

White = 96.1%

Black = 1%

American Indiana and Alaska Native = 0.3%

Asian = 1%

Native Hawaiian and Other Pacific Islander = Value greater than zero but less than half unit of measure shown

Two or more races = 1.5%

Hispanic or Latino = 3.4%

There is no data with the U.S. Census Bureau American Community Survey 5-Year Estimates under SELECTED SOCIAL CHARACTERISTICS estimates the number of people in Tipton County who speak a language other than English to be 405 with those speaking English less than "very well" estimated at 1.0% or approximately 156 individuals who may be considered limited in English proficiency. The margin of error is +/- .05%.

According to the census numbers above there may be up to 156 individuals who live in Tipton County that may be considered LEP. Based on actual contact between County Staff and the community there have been very few requests from anyone in the service area asking the County to provide language translation services. Therefore, the LEP population is probably even less than the estimate shown above.

## Factor 2: The frequency with which LEP individuals come into contact with the program, activity or service:

Due to the infrequent requests for translation services, there appears to be a minimal need for translation services from the County.

## Factor 3: The nature and importance of the program, activity, or service provided by the program:

If at any time a LEP individual requests translation services that are considered important such that denial or delay of access or services or information could have serious or even life threatening implications, the County will provide, upon request, services to assist the LEP population including translation of vital County documents and interpretation services.

#### Factor 4: SUMMARY OF LEP ACCOMMODATION PLAN

- The County of Tipton strives to serve its population to the best of its ability and will provide upon request, services to assist the LEP population including translation of vital documents and interpretation services deemed necessary to provide meaningful access to County services.
- A U.S. Census Bureau I Speak card is available as part of this document.
   This card allows LEP individuals to communicate their preferred language to the County Staff whereas the County staff may then access a translation service as determined by the County.
- The County of Tipton reviews written Title VI complaints and ensures every effort is made to resolve complaints informally at the local level and review and update the County's Title VI plan and procedures as required.
- Staff for the County will be provided training on the requirements for providing meaningful access to services for LEP persons and new employees will receive the same training.

#### **TITLE VI TRAINING**

## 2025 GOAL EMPLOYEE DISSEMINATION & TRAINING

At the time of hire (and annually to all employees if applicable): Title VI policy and literature will be provided to all Tipton County employees. The County of Tipton employees will be required to sign an acknowledgement of receipt indicating they have received and reviewed Title VI policy guidelines. New employees will be provided with education and literature at new employee orientation. Employees will be provided with updated education and literature as Tipton County deems necessary.

Ongoing training provided to current employees: Current employees will receive training annually. Training will consist of any updated material that relates to Title VI and any updated policies to Tipton County's Title VI Program and will be provided by the Tipton County ADA / Title VI Coordinator either in person and/or by electronic means.

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

#### **PUBLIC INVOLVMENT**

#### **DATA COLLECTION**

Pursuant to 23 CFR 200.9(b) (4), Tipton County shall collect and analyze statistical information regarding demographics to assist in monitoring and ensuring nondiscrimination in all of its programs and activities.

Tipton County shall utilize a voluntary Title VI public involvement survey that will be available at all public hearings and meetings. The survey will allow respondents to remain anonymous. The survey will ask questions regarding the respondent's gender, ethnicity, race, age, income and if they are disabled. The facilitator of the public hearings and meetings will make an announcement at the beginning of the meeting informing attendees of the survey and its purpose and a request will be made for the attendees to complete the voluntary survey. Completed surveys will be retained by the ADA / Title VI Coordinator for three (3) years.

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

#### **COMMUNITY INVOLVMENT & OUTREACH**

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

The County of Tipton host meetings bi-weekly and monthly and those meetings are open to the public. Any meetings that are open to the public are published on the Tipton County's website. All of Tipton County public meetings are held in locations accessible to individuals with disabilities. Upon request, translators can be provided free of charge to those individuals with

Limited English Proficiency. Auxiliary aids are also available upon request.

Requests must be made in a minimum of forty-eight (48) hours in advance.

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

#### **REVIEW OF PROGRAM AREA**

This section outlines annual goals set forth by the County of Tipton to comply with Title VI requirements and statutes. This list will be monitored for updates and additions.

#### ANNUAL WORK PLAN

Tipton County's plan is to create and implement a Title VI Plan that works for all its citizens. This plan will be updated annually and submitted to INDOT by October 1<sup>st</sup> of each calendar year.

### **APPENDIX**

- A. Assurances
- **B.** Complaint Policy
- C. Complaint Log
- D. External Complaint Procedure/Form
- E. Public Involvement Survey
- F. I Speak Cards
- G. Training Materials & Records of Training Attendance\*
- H. Reports and Outcomes of Data Collected\* \*\*

- \* To be added on a future date.
- \*\* if applicable / as applicable.

**APPENDIX A: ASSURANCES** 

The County of Tipton (hereinafter referred to as the "Recipient") HEREBY AGREES THAT as a condition to receiving any Federal financial assistance for the Department of Transportation and the Federal Highway Administration, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 78. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations (CFR), Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964, Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes.

Implementation and Review Procedures (hereinafter referred to as the Regulations) and other pertinent nondiscrimination authorities and directives, to the end that in accordance with the Act, Regulations, and other pertinent nondiscrimination authorities and directives, not person in the United States shall, on the grounds of religion, race, color, or national origin, sex (23 USC 324), sexual orientation, gender identity (Executive Order 13672) age (42 USC 6101), disability/handicap (29 USC 790) and low income (Executive Order 12898) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by Title 49 Code of Federal Regulations, subsection 21.7(a)(1) of the Regulations, copy of which are attached.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal Aid Highway Program.

- 1. That the Recipient agrees that each "program" and each "facility as defined in 49 CFR subsections 21.23(e) and (b) and 23 CFR 200.5(k) and (g) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
- That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all Federal Aid Highway Programs and, in adapted form in all proposals for negotiated agreements.

The County of Tipton, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally assisted programs of the Department of Transportation and Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes, issued pursuant to such Acts, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of religion, race, color, national origin, sex, sexual orientation, gender identity, age, disability/handicap and low income in consideration for an award.

- 3. That the Recipient shall insert the clauses of Appendix A of this assurance in every contract subject to the Acts and the Regulations.
- 4. That the Recipient shall insert the clauses of Appendix B of this assurance, "as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein."
- That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.

- 6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.
- 7. That the Recipient shall include the appropriate clauses set forth in Appendix C of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under the Federal-Aid Highway Program; and (b) for the construction or use of or access to space on, over or under real property acquired, or improved under the Federal-Aid Highway Program.
- 8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
- 9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.
- 10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient Department of Transportation under the Federal-Aid Highway Program and is binding on it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest and other participants in the Federal-Aid Highway Program. The person or persons whose signatures appear below are authorized to sign the assurance on behalf of the Recipient.

Signature	Date	

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

- Compliance with Regulations; The contractor shall comply with the Regulation relative to
  nondiscrimination in Federally-assisted programs of the Department of Transportation
  (hereinafter, "DOT") Title 49, Code of Federal Regulations, Part 21, and the Federal Highway
  Administration (hereinafter "FHWA") Title 23, Code of Federal Regulations, Part 200 as they may
  be amended from time to time, (hereinafter referred to as the Regulations), which are herein
  incorporated by reference and made a part of this contract.
- 2. Nondiscrimination: The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of religion, race, color, national origin, sex, sexual orientation, gender identity, age, disability/handicap and low income in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by 49 CFR, section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
- 3. Solicitations for Subcontractors, Including Procurements of Materials and Equipment: In all solicitations either by competitive bidding or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of religion, race, color, national origin, sex, sexual orientation, gender identity, age, disability/handicap and low income.
- 4. Information and Reports: The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and it facilities as may be determined by the Indiana Department of Transportation (INDOT) or the FHWA to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall so certify to INDOT or the FHWA as appropriate, and shall set forth what efforts it has made to obtain the information.
- 5. **Sanctions for Noncompliance:** In the event of the contractor's noncompliance with the nondiscrimination provisions of the contract, INDOT shall impose such contract sanctions as it or the FHWA may determine to be appropriate, including, but not limited to:
  - a) Withholding of payments to the contractor under the contract until the contractor complies, and/or
  - b) Cancellation, termination or suspension of the contract, in whole or in part.

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

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

#### **APPENDIX B**

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

#### (GRANTING CLAUSE)

NOW, THEREFORE, the Department of Transportation, as authorized by law, and upon the condition that the Tipton County will accept title to the lands and maintain the project constructed thereon, in accordance with Title 23, United States Code of Federal Regulations, the Regulations for the Administration of Federal-Aid Highway Programs and the policies and procedures prescribed by FHWA, also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation and Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes (hereinafter referred to as the Regulations) pertaining to an effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Indiana Department of Transportation all the right, title and interest of the Department of Transportation in and to said lands described in Exhibit "A" attached hereto and made a part hereof.

#### (HABENDUM CLAUSE)

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

Tipton County, in consideration of the conveyance of said lands and interests in lands does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person shall on the grounds of religion, race, color, national origin, sex, sexual orientation, gender identity, age, disability/handicap and low income be excluded from participation in be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on over or under such lands here by conveyed [,] (and)\* (2) that the County of Tipton shall use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964, Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes - Implementation and Review Procedures, and as said Regulations may be amended [,] and (3) that in the event of breach of any of the above mentioned nondiscrimination conditions, the department shall have a right to re-enter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the Department of Transportation and its assigns as such interest existed prior to this instruction.\*

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the County of Tipton pursuant to the provisions of Assurance 7(a).

The (grantee, licensee, lessee, permitee, etc., as appropriate) for himself, his heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant an degree [in the case of deeds and leases add :as a covenant running with the land"] that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal regulations, Department of Transportation, Subtitle A, office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of-Transportation-Effectuation of Title VI of the Civil Rights Act of 1964, Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes – Implementation and Review Procedures, and as said Regulations may be amended.

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

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

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

[Include in deed]\*

That in the event of breach of any of the above nondiscrimination covenants, Tipton County shall have the right to re-enter said lands and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of Tipton County and its assigns.

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

#### APPENDIX B: COMPLAINT POLICY

Any person who believes that he or she as a member of a protected class, has been discriminated against based on race, color, national origin, gender, age, disability, religion, low income status, or Limited English Proficiency in violation of Title VI of the Civil Rights Act of 1964, as amended and its related statutes, regulations and directives, Section 504 of the Vocational Rehabilitation Act of 1973, Americans with Disabilities Act of 1990, as amended, the Civil Rights Restoration Act of 1987, as amended, and any other Federal nondiscrimination statute may submit a complaint. A complaint may also be submitted by a representative on behalf of such a person.

It is the policy of the County of Tipton to conduct a prompt and impartial investigation of all allegations of discrimination and to take prompt effective corrective action when a claim of discrimination is substantiated.

No one may intimidate, threaten, coerce or engage in other discriminatory conduct against anyone because they have taken action or participated in an action to secure rights protected by the civil rights laws. Any individual alleging such harassment or intimidation may submit a complaint by following the procedure printed below.

Any individual who feels that he or she has been discriminated against may submit a written complaint to the County's ADA/Title VI Coordinator. The complaint should be submitted within 180 days of the alleged discrimination. Complaint forms may be found on here at tiptongov.com under the departments heading click on ADA/Title VI Information page under Document Center. You may also acquire the documents directly from the ADA/Title VI Coordinator.

Generally, a complaint should include the name, address and telephone number of the individual complaining (complainant) and a brief description of the alleged discriminatory conduct including the date of harm. An individual submitting a complaint alleging discrimination may include any relevant evidence, including the names of witnesses and supporting documentation.

Complaints should be directed to: Sherri Crawford, ADA/Title VI Coordinator 555 Market Road Tipton, IN 46072 (765) 675-4508

scrawford@tiptoncounty.in.gov

Within 60 days of the receipt of the complaint the County will conduct an investigation of the allegation based on the information provided and issue a written report of its findings to the complainant. The County will try to obtain an informal voluntary resolution to all complaints at the lowest level possible.

A complainant's identity shall be kept confidential except to the extent necessary to conduct an investigation. All complaints shall be kept confidential.

These procedures do not deny the right of any individual to file a formal complaint with any government agency or affect an individual's right to seek private counsel for any complaint alleging discrimination.

#### Complaints may also be filed with the following government agencies:

Indiana Department of Transportation Economic Opportunity Division 100 N. Senate, Room N750 Indianapolis, IN 46204

Phone: (317) 233-6511 Fax: (317) 233-0891

Indianapolis District EEOC Office 101 West Ohio Street, Ste 1900 Indianapolis, IN 46204

Phone: (800) 669-4000 Fax: (317) 226-7953 TTY: 1 (800 0 669-6820

Indiana Civil Rights Commission 100 N. Senate Ave., Room N103 Indianapolis, IN 46204

Toll Free: 1 (800) 628-2909 Phone: (317) 232-2600 Fax: (317) 232-6560

Hearing Impaired: 1 (800) 743-3336

#### APPENDIX C: COMPLAINT LOG

#### TIPTON COUNTY ADA/TITLE VI COMPLAINT LOG

#### 2025-2026

				3 2020		Date of Final	
Case No.	Investigator	Complaintant	Sub-Recipient	Protected Category	Date Filed	Report	Disposition
						U.	

#### APPENDIX D: EXTERNAL COMPLAINT PROCEDURE

#### **INSTRUCTIONS:**

The purpose of this form is to help any person interested in filing a discrimination complaint with the County of Tipton. You are not required to use this form. You may write a letter with the same information, sign it and return 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 the County of Tipton 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 the County of Tipton. Additionally, you have the right to seek private counsel.

Please make a copy of your complaint form for your personal records. Do not send your original supporting 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.

All complaints are to be sent to:

Sherri Crawford, ADA/Title VI Coordinator 555 Market Road Tipton, IN 46072 (765) 675-4508

scrawford@tiptoncounty.in.gov

APPENDIX E: VOLUNTARY PUBLIC INVOLVEMENT SURVEY

#### Completing this form is voluntary but encouraged.

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 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)). The County of Tipton 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 County of Tipton will use to monitor its programs and activities for compliance with Title VI and the Civil Rights Act of 1964, as amended and its related statutes and regulations.

If you have any questions regarding the County of Tipton's responsibilities under Title VI of the Civil Rights Act of 1964 to the Americans with Disabilities Act, please contact:

Sherri Crawford
ADA/Title VI Coordinator
555 Market Road
Tipton, IN 46072

scrawford@tiptoncounty.in.gov

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 above.

Meeting:	Commissi	oner's	Council	Other			
Project na	me, progra	am or serv	rice:				
		=41					
Gender		Female		Male			
Race: (ch	eck one or	more)					
	American	Indian or	Alaska Nat	ive		Asian	
	Native Ha	waiian or	Other Paci	fic Islander		White	
	Black or A	frican-Am	erican			Multiracial	
Age:	_		_	Disability			
	1-21		22-40		Yes		
	41-65		65+		No		
Househol	d Income:			3147	0.		
	\$0-\$1	12,000		\$12,001	-\$24,000		\$24,001-\$36,000
	\$36,001	-\$48,000		\$48,001	-\$60,000		\$60,001+

APPENDIX F: ISpeak Card



## "I Speak" Cards

These cards enable literate individuals with limited English proficiency (LEP) to correctly identify the language for which they need interpretation services.

Tipton County is committed to ensuring meaningful access to all of Tipton County's public meetings, programs and policies and activities.

Tipton County is pleased to provide these language identification cards to ensure that the correct interpreter is used for LEP persons.

The cards are a resource for all who work for Tipton County to ensure that we communicate effectively, meaningfully, and accurately in all of our encounters. A

AMHARIC እኔ አማርኛ መናገር

ARABIC

أنا أتحدث اللغة العربية

ARMENIAN Ես խոսում եմ հայերեն են

B

BENGALI

আমী ঝংলা কখা ঝেলতে পারী

BOSNIAN

Ja govorim bosanski

BULGARIAN

Аз говоря български

BURMESE

ကျွန်တော်/ကျွန်မ မြန်မာ လို ပြောတတ် ပါတယ်၊

C

CAMBODIAN

ខ្ញុំនិយាយភាសាខ្មែរ

CANTONESE

我講廣東話 traditional

我讲广东话 simplified

CATALAN

Parlo català

CHIN

Lai Tong ka ton—Falam chin Lai Holh Ka thiam—Hakha chin Zo bya ka thya—Zo tung Chin

CROATIAN

Govorim hrvatski

CZECH

Mluvím česky

D

DANISH

Jeg taler dansk

DARI

من دری حرف می زنم

DUTCH

Ik spreek Nederlands

E

ESTONIAN

Ma räägin eesti keelt

F

FARSI

من فارسى صحبت مى كنم.

FINNISH

Puhun suomea

FRENCH

Je parle français

G

GERMAN

Ich spreche Deutsch

GREEK

Μιλάω στα ελληνικά

GUJARATI

હુ ગુજરાતી બોલુ છુ

H

HAITIAN CREOLE

M pale kreyòl ayisyen

HEBREW

אני מדבר עברית masculine אני מדבר עברית feminine

HINDI

में हिंदी बोलता हूँ।

HMONG

Kuv hais lus Hmoob

HUNGARIAN

Beszélek magyarul

ı

ICELANDIC

Èg tala íslensku

ILOCANO

Agsaonak ti Ilokano

INDONESIAN

saya bisa berbahasa Indonesia

ITALIAN

Parlo italiano

J

JAPANESE

私は日本語を話す

K

KACKCHIQUEL

Quin chagüic' ká chábal' ruin' rí tzújon cakchiquel

KAREN

ယကတီးကညီကျိဉ်

KIRUNDI

Ndavuga Ikirundi Nvuga Ikirundi

KOREAN

나는 한국어로 이야기

KURDISH

man Kurdii zaanim

KURMANCI

man Kurmaanjii zaanim

LAOTIAN

ຂາ້ພະເຈາ້ເວາ້ພາສາລາວ

LATVIAN

Es runâju latviski

LITHUANIAN

Aš kalbu lietuviškai

M

MANDARIN

我講國語

traditional

我讲国语/普通话

simplified

MAM

Bán chiyola tuj kíyol mam

MON

ॐ एट्टी अल्टि क्र्ये

N

NEPALI

म नेपाली बोल्न

NORWEGIAN

Jeg snakker norsk

D

PERSIAN

من فارسى صحبت مى كنم.

POLISH

Mówię po polsku

PORTUGUESE

Eu falo português do Brasil for Brazil

Eu falo português de Portugal for Portugal

PUNJABI

ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ।

Q

Q'ANJOB'AL

Ayin tí chí walq' anjob' al

QUICHE

In kinch'aw k'uin ch'e quiche

R

ROMANIAN

Vorbesc românește

RUSSIAN

Я говорю по-русски

S

SERBIAN

Ја говорим српски

SIGN LANGUAGE (AMERICAN)



I, ME



SIGN, SIGN LANGUAGE

SINHALESE

මට සිංහල කතා කළ හැකිය

SLOVAK

Hovorím po slovensky

SLOVENIAN

Govorim slovensko

SOMALI

Waan ku hadlaya af-Soomaali

SPANISH

Yo hablo español

SWAHILI

Ninaongea Kiswahili

SWEDISH

Ja talar svenska

T

TAGALOG

Marunong akong man-Tagalog

TAMIL

நான் தமிழ் பேச

India

நான் தமிழ் கதைப்பேன்

Sri Lanka

THAI

พูดภาษาไทย

TIGRINYA

ትግርኛ እዛረብ

TURKISH

Türkçe konuşurum

U

UKRAINIAN

Я розмовляю українською мовою

URDU

میں اردو بولتا ہوں

V

VIETNAMESE

Tôi nói tiêng Việt

W

WELSH

Dwi'n siarad

X

XHOSA

Ndithetha isiXhosa

Y

YIDDISH

איד רעד יידיש

YORUBA

Mo nso Yooba

Z

ZULU

Ngiyasikhuluma isiZulu

## Select ethnic languages of Burma/Myanmar

Ethnic Grouping	Linguistic Variant	Phrase in the Ethnic Languages	
Kachın	Jingpho	Ngai jinghpaw ga shaga ai	
	Lisu	=OJ ,.EL ,X :OA UZ-IJ WA	
	Rawang	Nga Rawang Ka Shxne	
Karenni (Kayah)	Karrenni/Padaun	<b>ූසින් මූහම් වේග් මීට මේ</b> වෙර	
Karen	S'gaw	ယကတိၢကညီကိုာ်	
	Eastern Pwo	ယ်ချင်ဖွံ့၊	
Chin	Tedim	Kei Tedim Pau pau ing	
	Falam	Falam tong ka tong	
	Hakha	Hakha holh ka thiam	
	Zophei	Zyphe rae ka cui	
	Thantlang	Thantlang holh ka thiam	
	Lautu	Lautu စကားပြောပါသည်	
	Matu	Matu awl ka cal	
	Mindat	Mindat စကားပြောပါသည်	
	Kanpetlet	Kanpetlet စကားပြောပါသည်	
	Mizo	Mizo tong ka thiam	
	Mara	Mara reih ei chei	
	Zotung	Zo Bya Ka Thya	
	Kumi	Kumi စကားပြောပါသည်	
Mon	Mon/Mun	အဲဟိုအရေဝ်မန်ရ	
Bamar	Burmese	မြန်မာစကားပြောပါသည်	
Arakan (Rakhine)	Rakhine/Arakan	ရခိုင်ပိုင်စကားပြောပါရေ	
	Rohingya	Rohingya စကားပြောပါသည်	
Shan	Palaung	Palaung စကားပြောပါသည်	
	Shan	Shan စကားပြောပါသည်	

## Select indigenous languages of Mexico

Agrupación Lingüística	Variante Lingüística	Frase en español	Frase en lengua
chichimeo jonaz	chichimeco jonaz	yo hablo chichimeca	ikáuj úza' ér~í
mazateco	mazateco del norte	yo hablo mazateco Hablo la lengua de Santa María Chilchotla	Cha'ña enná Cha'ña énn nda xo
maya	maya	Yo hablo maya	teen k-in t'aan maya
mixe	mixe bajo	Yo hablo mixe	Madyakpiëch ayuuk
	mixe alto, de Tlahuitoltpec	Yo hablo mixe	Xaamkējxpët ayuujk ēts nkajpyxypy
mixteco	mixteco del oeste de la costa	yo hablo mixteco	Yuu kain se'en savi ñu ñundua
náhuatl	náhuatl de la huasteca veracruzana (se entiende junto con Ve racruz y San Luis Potosí)	yo hablo náhuatl	Na nitlajtowa náhuatl
tojolabal	tojolabal	yo hablo tojolabal	Ja 'ke 'ni wala kúmaniyon tojol-abá
triqui	triqui de la baja	yo hablo triqui	'unj a'mii xna' ánj nu' a
tseltal	tseltal (variante unificada)	yo hablo tseltal	Te jo'one ja k'op te bats'il k'op tseltal
tsotsil	tseltal (variante unificada)	yo hablo tsotsil	Vu'une jna'xi k' opoj ta bats'i k'op
zapoteco	zapoteco de la planicie costera	yo hablo zapoteco	Naa riné' dildxazá
chinanteco	chinanteco del sureste medio	yo hablo chinanteco	Jnea lo'n jujmií kiee' dsa mo' kuōo