



**TITLE VI IMPLEMENTATION PLAN
FISCAL YEAR 2026**

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I. Introduction

This Title VI Implementation Plan is a part of the Noble 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 1964 (Title VI), 49 CFR § 26, and the related anti-discrimination statutes and regulations. With this Implementation Plan, Noble County seeks to provide continued transparency, clarity, and technical guidance for internal and external constituents regarding its Title VI program.

II. Title VI Non-Discrimination Notice & Policy

Noble County values each individual's civil rights and wishes to provide equal opportunity and equitable service for the citizens of this state. As a recipient of federal funds, Noble 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 from Noble County on the grounds of race, color, age, sex, sexual orientation, gender identity, disability, national origin, religion, income status or limited English proficiency. Noble 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 Noble County to comply with Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1964, 42 USC § 2000e; Age Discrimination Act of 1975, 42 USC §§ 6101-6107; Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 USC §§ 4601-4655; 1973 Federal Aid Highway Act, 23 USC § 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 USC §§ 701 et seq; Civil Rights Restoration Act of 1987, Pub. L. No. 100-259, 102 Stat. 28; Americans with Disabilities Act of 1990, 42 USC §§ 12101 et seq.; Title VIII of the Civil Rights Act 1968, 42 USC §§ 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, subrecipients, and contractors and 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, Noble 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.

Noble 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, Noble County will take reasonable steps to provide meaningful access to services for persons with limited English proficiency (LEP). Noble County will, where necessary and appropriate, revise, update and incorporate nondiscrimination requirements into appropriate manuals, directives, and regulations.

NOBLE COUNTY - Title VI Implementation Plan

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

The following individuals have been identified as the Noble County's Title VI and ADA Coordinators, 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:

Jackie Knafel

Title VI Coordinator

109 N. York Street

Albion, IN 46701

Phone: 260-636-2658

Fax: 260-636-4001

E-mail: jackie.knafel@nobleco.gov

Zachary Smith

ADA Coordinator

1118 E. Main Street

Albion, IN 46701

Phone: (260) 636-2124 ext. 6001

Fax: (260) 636-2542

zack.smith@nobleco.gov

III. Title VI Assurances & Implementation

Noble County affirms its commitment to nondiscrimination annually by publishing its Annual Title VI Implementation Plan and reaffirming its Assurances of Nondiscrimination, incorporated herein.

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 Noble County by commissioners acceptance, and it is effective for plan year 2025-26. This plan will be renewed on or before 06/26/2026.

Noble County, Indiana
(Name of Recipient)

Dated 2/9/26



Gary Leatherman
Noble County Commissioner President
(Signature of Authorized Official)

IV. Organization & Staffing

Noble County is governed by elected officials who then appoint or hire department heads. Jackie Knafel, Human Resources Director, is the Title VI Program Manager and Zack Smith, County Engineer, is the ADA Coordinator. These roles are responsible for developing and overseeing the Title VI, LEP, and ADA plans, reports, and surveys. The Title VI Coordinator is the main point of contact for all Civil Rights issues from the public and provides Title VI, LEP, and ADA training to employees annually and assists all staff members regarding Civil Rights.

Name	Department	Phone
Zack Smith	ADA Coordinator	260-636-7877
Jackie Knafel	Title VI Coordinator	260-636-2658
Ben Castle	Assessor	260-636-2297
Michelle L. "Shelley" Mawhorter	Auditor	260-636-2658
Tammy Bremer	Clerk	260-636-2736
Rob Tomlinson	Treasurer	260-636-2644
Tonya Jones	Recorder	260-636-2672
Judge Michael Kramer	Circuit Court	260-636-2128
Judge Steven Clouse	Superior I Court	260-636-3205
Judge Steve Hagen	Superior II Court	260-636-2128
Max Weber	County Sheriff	260-636-2182
Gabe Creech	Emergency Management (EMA)	260-636-2938
Mike Clouse	Veterans Service Officer	260-636-1298
Matt Dice	Extension Office	260-636-2111
Dr. Elizabeth Schowe, MD, MPH	Health Department	260-636-2191
James J. Abbs	Public Defender	260-636-6688
Shellie Coney	E911 Dispatch	260-636-6224
Gary Leatherman	Commissioners	260-636-7877
Dave Baum	IT	260-636-1299
Steven Hook	GIS	260-636-1293
Teresa Tacket	Plan Commission	260-636-7217
Steve Kirkpatrick	Parks and Recreation	260-636-2658
Jim Mowery	Child Support	260-636-2494
Jim Mowery	Prosecutor's Office	260-636-2193
Randy Sexton	Surveyor	260-636-2131 x4501
Jennetta Calvelage	Drainage Board	260-636-2131 x4505
Zachary Smith, PE	Highway Department	260-636-2124
Jared Owen	Probation	260-636-3116
Jared Owen	Court Svcs/Community Corrections	260-636-2900

V. Program Review Procedures

Employee Dissemination & Training

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

Ongoing Training provided to current employees: Current employees will receive training as new

training and materials are available. Training may consist of webinars, videos, and educational documents as they become available.

Examples of training may include:

Understanding and Abiding by the Title VI of the Civil Rights Act

<https://www.youtube.com/watch?v=lw0mefqlZ5Y>

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

VI. Contractors, Subcontractors, Vendors & Consultants

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

VII. Complaint Process

Noble County will promptly and thoroughly investigate all properly submitted complaints of alleged discrimination. Noble County will also attempt to resolve such complaints and take corrective action upon the finding of a substantiated complaint. The county will make reasonable efforts to facilitate voluntary, early resolution of complaints at the lowest level possible. The complaint investigation procedure is part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Any individual who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Noble County service, program, or activity (whether Federally funded or not), based on their race, color, national origin, gender, age, disability, ancestry, income status, or limited English proficiency may file a complaint with the Noble County's Title VI Coordinator. Complaint forms can be found in Appendix F, on the Noble County's website at: or by contacting the Title VI Coordinator. For a complaint to be considered, the complainant must file the appropriate documentation within 180 calendar days after the alleged act of discrimination occurred.

Complaint Requirements

Complaints must be made in writing and shall be signed by the complainant and/or the complainant's representative. Noble County does not accept anonymous complaints. Complaints must contain the following information and describe as completely as possible the facts and circumstances surrounding the alleged discrimination:

- Name of the complainant
- Contact information of the complainant (telephone number, address, email address)
- The full name and address of the respondent, individual, agency, department, or program that allegedly discriminated against the complainant.
- A description of the alleged discriminatory act(s) that violated Title VI (i.e., an act of intentional discrimination or one that has the effect of discriminating based on race, color,

national origin, sex, age, or disability). The description must include the date of the incident, and how, where, or why the complainant believes they were discriminated against.

- Names and contact information of all witnesses and
- Any other information that is deemed significant.

If a complainant is unable or incapable of providing a written statement, a verbal complaint may be made to the Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the Title VI Coordinator will assist the complainant in completing a written complaint. The Title VI Coordinator will provide the written complaint to the complainant for confirmation, review, and signature before processing.

Conference With Title VI Coordinator

Within fifteen (15) calendar days after receipt of the complaint, the Title VI Coordinator will arrange to speak or meet with the complainant to discuss the complaint and possible resolutions, if applicable. If a complaint is deemed incomplete, additional information will be requested. The complainant has thirty (30) calendar days to respond to the request for additional information. A complainant's failure to respond to the request within thirty (30) calendar days may result in the administrative closure of the complaint. Additionally, **the county will notify INDOT of complaints within ten (10) days.**

Jurisdiction

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

Title VI Coordinator Investigation

The Title VI Coordinator will conduct a complete and thorough investigation of complaints inside the Noble County's jurisdiction and based upon the information obtained will strive to render a final written response letter to the complainant or their representative by registered mail or hand delivery within sixty (60) calendar days. The Title VI Coordinator will inform the respondent of the complainant's allegations, request a position statement, respond to all aspects of the complainant's allegations, and may assign a staff member to handle the investigation.

The Title VI Coordinator's final written response to the complainant will include a description of the complaint, a summary of the investigation and the findings of such, summaries of all individuals interviewed, and if appropriate, recommendations and resolutions. All written complaints, investigations, and responses will be retained by Noble County for at least three (3) years.

Confidentiality

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

Corrective Action

If Noble County recommends corrective action, the county will give the respondent thirty (30) calendar days to inform of the actions taken for compliance. The Title VI Coordinator shall monitor the respondent's corrective action compliance. Such corrective action may include actions the respondent will complete at a future date within the initial thirty days and must include the projected time in which the respondent will complete the action.

If the respondent has not taken the recommended correction action within the thirty-day period allowed, Noble County will take corrective action to comply with Title VI. Noncompliance not corrected may be subject to sanctions as provided in 49 C.F.R. § 21.13.

DOJ Complaint

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

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

Complaints may also be filed with the following government agencies:

Indiana Department of Transportation (INDOT)
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) 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

Records Retention

Noble County will maintain all records of an investigation in a confidential area for three (3) years after the completion of the investigation.

Complaint Closure

It is the general practice of Noble County to investigate all complete complaints. However, the county may administratively close a complaint at its discretion. The types of complaints that may be administratively closed and not investigated include, but are not limited to:

- Complaints that fail to state a claim or provide any substantial or coherent claim.
- Complaints that are outside the scope of the Noble County's Title VI jurisdiction
- Untimely complaints filed more than 180 days after the alleged discriminatory acts.
- Complaints voluntarily withdrawn by the complainant.
- Complaints in which the investigation has been impaired by the county 's inability to locate the complainant.
- Complaints that are a continuation of a pattern of previously filed complaints involving the same or similar allegations against the same respondent or other respondents that repeatedly have been found factually or legally unsubstantiated by the Noble County
- Complaints containing the same or similar allegations and issues that have been addressed in a recently closed complaint or compliance review conducted by the county.
- Complaints containing allegations that are foreclosed by previous decisions by state and Federal courts, the Department of Justice, or county policy determinations.
- Complaints filed for complainants or parties who refused to cooperate with the investigation and whose lack of cooperation substantially impairs the completion of the investigation.
- Complaints transferred to another agency for investigation and
- Complaints where the death of a complainant makes it impossible to investigate the allegations fully.

Noble County will notify the complainant in writing when a determination is made to administratively close a case without further investigation. The notification shall include a basis for the administrative closure.

VIII. Public Dissemination

The Noble County Title VI plan and policy is available in the following County offices for viewing: Highway, South Complex and the first floor of the Courthouse. A copy of the Title VI plan will also be available at the County's Public Library at 813 E. Main Street, Albion, IN and 221 S. Park Avenue, Kendallville. A copy of the Title VI plan and policy may also be available on the Noble County website - [Noble-County-Title-VI-Plan-040824.pdf](https://www.noblecountycler.org/TitleVI/TitleVIPlan.pdf).

Noble County Title VI plan and policy, which includes the ADA/Section 504 plan, Limited English Proficiency (LEP) plan and complaint procedures, is available on the Noble County's Website at [Noble County: Noble County Title VI Procedures](https://www.noblecountycler.org/TitleVI/TitleVIProcedures.pdf). Copies of any of these plans will be provided upon request. LEP individuals may obtain translated copies of these plans upon request. Any questions or comments regarding this plan should be directed to the Title VI Coordinator.

IX. Community Involvement & Outreach

The county commits to ensure community involvement and outreach is conducted in a respectful and appropriate manner that will allow for diverse involvement. Public meetings, programs and activities will provide equitable opportunities for participation. As such, this plan will be open for public comment and be adopted at a public hearing once approved by the county commissioners.

Noble County Commissioners meet bimonthly, and those meetings are open to the public. Any meetings that are open to the public are published on the Noble County's website and distributed to local media outlets. All Noble 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. All such requests must be made at least forty-eight (48) hours in advance of the public meeting.

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

X. Data Collection

Noble County will collect and analyze statistical information regarding demographics to assist in monitoring and ensuring nondiscrimination in all of its programs and activities. Noble County will utilize a voluntary public involvement survey (Appendix H) to collect information regarding people affected by proposed projects. The survey permits respondents to remain anonymous, while voluntarily answering questions regarding their gender, ethnicity, race, age, disability status, and household income.

As noted above, some information is collected periodically with the objective of determining what data needs to be collected. The following types of data are collected by the County:

- Complaints received, logged, processed, and investigated by the county.
- Limited English Proficiency reports
- Title VI Training, as required.
- Public Involvement Survey
- Records of meeting minutes and discussions related to Title VI in all program areas.
- Identifying a program area and any associated risks may be obtained during project or other

county-related information meetings or right of way data collection, which includes information on the valuation of impacted, negotiations with impacted property owners, and the relocation of impacted property owners and tenants. Project data regarding the race, color, national origin, sex, age, and disability of the property owners of parcels valued, property owners, and property owners/tenants relocated can be collected. This data would be evaluated to determine if the processes in Right of Way were conducted in a non-discriminatory manner. Any data collected should be collected in a manner that is reportable upon request from funding agency.

Noble County plans to make this survey available at all public hearings and meetings and in appropriate county buildings. Completed surveys shall be retained for a period of three (3) years from the date of the meeting.

XI. Section 504/Americans with Disabilities Act (ADA)

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

For more information regarding the Noble County's ADA policy, please visit the Noble County's website at [Noble County: Noble County ADA Procedures](#). ADA complaint forms can also be obtained on the Noble County's website or by contacting one of the Noble County's ADA Coordinators.

ADA Coordinator

Zack Smith

1118 E. Main Street

Albion, IN 46701

Phone: (260) 636-2124 ext. 6001

Fax: (260) 636-2542

zack.smith@nobleco.gov

XII. Limited English Proficiency (LEP) Plan

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

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

To prepare this plan, Noble County utilized the U.S. Department of Transportation's four-factor LEP analysis, which considers the following factors:

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

Using the U.S. Census Bureau's American Community Survey 2020 5- Year Estimates, of the population (47,811) approximately 15.4% of people in the Noble County, age 5 years and older, speak English "less than very well." Noble County also surveyed its staff regarding the frequency of problems encountered with people that are LEP. These surveys affirmed that Noble County staff rarely, if ever, have had issues communicating with and providing services for LEP individuals. When there has been contact with an LEP individual, the staff has been able to accommodate the language barrier.

The county also utilizes a Voluntary Title VI Public Involvement Survey (Appendix H) to assess the frequency with which LEP individuals encounter county programs, activities, and services. The Voluntary Title VI Public Involvement Survey is made available at public meetings and in appropriate public buildings.

In compliance with the U.S. Department of Transportation's LEP analysis, Noble County has considered and implemented the following:

- The number or proportion of LEP persons who may be served or likely to encounter a Noble County program, activity or service is approximately 15.4%, slightly higher than surrounding counties.
- The frequency with which LEP people encounter Noble County programs, activities, or services is very low, based on our staff survey.
- To ensure meaningful access to LEP persons to Noble County programs, activities, and services, the county offers interpretation services on an as needed basis if requested forty-eight (48) hours in advance. This service is provided free of charge.

Noble County is aware that its community profile is ever-changing. As a result, this LEP plan will be re-evaluated annually to ensure the plan remains reflective of community needs. Anyone requiring special language services or accommodation must contact the Title VI Coordinator.

XIII. Policy Statement

Noble County Title VI Policy Statement

Noble County values each individual's civil rights and wishes to provide equal opportunity and equitable service for its citizens. As a recipient of federal funds, Noble County is required to conform to Title VI and all related statutes, regulations, and directives, which provide that no person shall be excluded from participation for, denied benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from the Department of Transportation on the grounds of race, color, age, sex, disability, national origin, or income status.

Noble County, Indiana

(Name of Recipient)

Dated

2/9/26



Gary Leatherman

Noble County Commissioner President

(Signature of Authorized Official)

XIV. Social Equity & Environmental Justice

Ensuring the meaningful involvement of low income, minority, disabled, senior, and other traditionally underrepresented communities is a key component of the county's public participation activities. The Noble County's policies, procedures, and programs are consistent with federal and state environmental justice laws, regulations and requirements, Title VI, related nondiscrimination requirements and reflect the principles of social equity and environmental justice. Social equity means ensuring that all communities are treated fairly and are given equal opportunity to participate in the planning and decision-making process, with an emphasis on ensuring that traditionally disadvantaged groups are not left behind. Environmental justice means ensuring that plans, policies, and actions do not disproportionately affect low income and minority communities.

XV. Title VI Goals & Accomplishments

As provided in Appendix H, Noble County will submit its Title VI goals and accomplishments Report to INDOT annually no later than October 1st, based on the following:

1. Implement compliance and annual reviews of the Title VI plan, making revisions as needed.
2. Review minority participation and examine appropriate methods of encouraging minority participation in county events and activities.
3. Review demographic information relative to the community and provide cost efficient methods of facilitating alternative language formats for those with LEP.
4. Ensure employees have received training on Title VI policies and procedures.

Title VI Reporting/Accomplishments

- Provide Training Materials to Department Heads on Title VI Program and LEP Plan: 06/06/2025
- Update Title VI Policy: 05/27/2025
- Placement of Updated Title VI Implementation Plan and forms on Noble County Website: 06/23/2025
- INDOT Title VI Training for Title VI Coordinator: 9/22/2025

Title VI Goals

- Train employees on Title VI: Ongoing
- Identify sub-recipients: 08/15/2026
- Provide training materials to sub-recipients: 08/15/2026
- Review all programs for Title VI implications: 08/15/2026
- Update Title VI plan as needed and post on website with new revision date: 09/15/2026

APPENDIX A – Title VI- Standard DOT Assurances

**The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination DOT Assurances
DOT Order No. 1050.2A**

Noble County (hereinafter referred to as the "Recipient") **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through the Federal Highway Administration, is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 Stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- Title 49, C.F.R. Part 21, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, (entitled Non-discrimination In Federally-Assisted Programs Of The Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurances that it will promptly take any measures necessary to ensure that:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity,” for which the Recipient receives Federal financial assistance from DOT, including the Federal Highway Administration.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

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. The Recipient agrees that each "activity", "facility" or "program" as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. 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 regardless of funding source:

"The County of Noble County in accordance with Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin consideration for an award"

3. The Recipient shall insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient shall insert the subclauses of Appendix B of this assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will 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 will extend to rights to space on, over or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, permits, and similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project or program;
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or 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 will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-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 Acts, 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 Acts, the Regulations, and this Assurance.

By signing this Assurance, Noble County also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the Federal Aid Highway Program access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the Federal Aid Highway Program. You must keep records, reports, and submit the material for review upon request to the Federal Aid Highway Program, or its designee in a timely, complete and accurate way. Additionally, you must comply with all other reporting, data collection and evaluation requirements, as prescribed by the law or detailed in program guidance.

Noble County gives this ASSURANCE is given in consideration of and for obtaining any and all Federal grants, loans, contracts, property, and/or discounts, or other Federal-aid financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Federal Aid Highway Program. This Assurance is binding on Indiana, other recipients, sub-recipients, subgrantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Federal Aid

NOBLE COUNTY - Title VI Implementation Plan

Highway Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Noble County, Indiana
(Name of Recipient)



Gary Leatherman

Noble County Commissioner President
(Signature of Authorized Official)

Date: 2/9/20

Appendix A of Assurances

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

1. **Compliance with Regulations:** The contractor shall comply with the Regulations 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, regarding the work performed by it during the contract, shall not discriminate on the grounds of race, color, national origin, sex, age, disability, 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 the Acts and the Regulations, including employment practices when the contract covers a program set forth in Part B of the Regulations.
3. **Solicitations for Subcontractors, Including Procurements of Materials & 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 race, color, national origin, sex, age, disability, and low income.
4. **Information and Reports:** The contractor shall provide all information and reports required by the Regulations, and directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Noble County, Indiana or the Indiana Department of Transportation ("INDOT") or to the FHWA to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall certify to the Noble County, Indiana or 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 this contract, the Noble County, Indiana shall impose such contract sanctions as it or INDOT or the FHWA may determine to be appropriate, including but not limited to:

- a. Withholding payments to the contract 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:

One (1) through six (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by Regulations, or directives issued pursuant thereto. The contractor shall take such actions with respect to any subcontract or procurement as the Noble County, Indiana or INDOT or the FHWA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, however, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor or supplier as a result of such direction, the contractor may request the Noble County, Indiana to enter into such litigation to protect the interests of the Noble County, Indiana and, in addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

Appendix B of Assurances

Clauses For Deeds Transferring United States Property

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the County of Noble County, Indiana 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 the Federal Aid Highway Programs and the policies and procedures prescribed by the Federal Highway Administration of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally- assisted programs of the U.S. Department of Transportation to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the County of Noble County, Indiana all the right, title and interest of the U.S. 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 Noble County, Indiana 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 Noble County, Indiana, its successors and assigns.

Noble County, Indiana, 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 on the grounds of race, color, national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that Noble County, Indiana shall use the lands and interests in lands and interests in the land so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S.

Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally- assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended[, and (3) that in the event of breach of any of the above-mentioned nondiscrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and the above described land and facilities will thereon revert to and vest and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

Appendix C of Assurances

Clauses For Transfer of Real Property Acquired or Improved Under the Activity, Facility, or Program

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

- A. The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself/herself, his/hers heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, Noble County shall have the right to terminate the (license, lease, permit, etc.) and to enter, reenter and repossess said lands and the facilities thereon, and hold the same as if (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the Federal Aid Administration will have the right or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of Noble County and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

Appendix D of Assurances

Clauses for Construction/Use/Access to Real Property Acquired Under the Activity, Facility or Program

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered by Noble County pursuant to the provisions of Assurance 7(b):

1. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
2. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, the County of Noble County will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
3. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, Noble County will there upon revert to and vest in and become the absolute property of Noble County and its assigns. *

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

Appendix E of Assurances

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities, including but not limited to:

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination based on race, color, or national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects).
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq.*), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 *et seq.*), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq.*), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 USC §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. §

47123) (prohibits discrimination on the basis of race, color, national origin, and sex);

- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1687 et seq.).

APPENDIX B - Complaint Log

APPENDIX C - Complaint Procedure

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, or low income status 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, the 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 of such a person. It is the policy of Noble County 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 acted 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 provided below.

Any individual who feels that he or she has been discriminated against may submit a written or verbal complaint. The complaint shall be communicated to the County Title VI Coordinator. The complaint must be submitted within 180 days of the alleged discrimination. Complaint forms may be found in Appendix D, on the county's website at: www.Rushvilleindiana.net, or by contacting the Title VI Coordinator.

Individuals are not required to use the County's complaint form. If necessary, the county will help an individual reduce his or her complaint to writing for his or her signature. Additionally, the county will notify INDOT of the complaint within ten (10) days.

Generally, a complaint must include the name, address, and telephone number of the 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 shall be directed to the Title VI Coordinator:

Jackie Knafel
109 N. York Street
Albion, IN 46701
Phone: 260-636-2658
Fax: 260-636-4001
E-mail: jackie.knafel@nobleco.gov

The county will investigate the allegation based on the information provided and will strive to issue a written report of its findings to the complainant within 60 days of receipt of the complaint. The county will attempt 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 investigate. 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. The complaint investigation procedure is part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

APPENDIX D - External Complaint of Discrimination Form

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

Title VI of the Civil Rights Act of 1964, as amended, and its related statutes and regulations ("Title VI") prohibit discrimination on the basis of race, color, national origin, sex, age, disability, or income status in connection with programs or activities receiving Federal financial assistance from the U.S. Department of Transportation, Federal Highway Administration, and/or Federal Transit Administration. These prohibitions extend to Noble County 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. Noble County is prohibited from retaliating against any individual because he or she opposed an unlawful policy or practice, filed charges, testified, or participated in any complaint action under Title VI or other nondiscrimination authorities.

You also have the right to file a complaint with other state or Federal agencies that provide Federal financial assistance to the Noble County. 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 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. Complaints should be filed with Noble County Title VI Coordinator:

Jackie Knafel
109 N. York Street
Albion, IN 46701
Phone: 260-636-2658
Fax: 260-636-4001
E-mail: jackie.knafel@nobleco.gov

NOBLE COUNTY - Title VI Implementation Plan

Please submit this form to: **Jackie Knafel**, 109 N. York Street, Albion, IN 46701, Phone: 260-636-2658, Fax: 260-636-4001, E-mail: jackie.knafel@nobleco.gov, or
Your complaint cannot be processed without your signature.

Name of complainant	Date	
Signature of complainant		
Complainant Information		
Name (first, middle, last)		
Address (number and street, county, state, ZIP code)		
Home phone number () -	Work phone number () -	Cellular phone number () -
Person/Department you believe Discriminated Against You		
Name (first, middle, last)		
Name of Department		
Address		
Home Phone Number () -	Cell Phone Number () -	Work Phone Number () -
When was the last alleged discriminatory act? (month, day, year)		
Complaints of discrimination must be filed within 180 days of the alleged discriminatory act. If the alleged acts of discrimination occurred more than 180 days ago, please explain your delay in filing this complaint.		
The alleged discrimination was based on:		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> Age <input type="checkbox"/> Gender <input type="checkbox"/> National Origin <input type="checkbox"/> Disability <input type="checkbox"/> Ancestry <input type="checkbox"/> Retaliation		
Name of complainant	Date	

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

Provide the names of any individuals with additional information regarding your complaint:

Name of witness 1 (first, middle, last)

Address

Home Phone Number () -	Cell Phone Number () -	Work Phone Number () -
--------------------------------------	--------------------------------------	--------------------------------------

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

Name of witness 2 (first, middle, last)

Address

Home Phone Number () -	Cell Phone Number () -	Work Phone Number () -
--------------------------------------	--------------------------------------	--------------------------------------

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

Name of witness 3 (first, middle, last)

Address

Home Phone Number () -	Cell Phone Number () -	Work Phone Number () -
--------------------------------------	--------------------------------------	--------------------------------------

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

APPENDIX E - Complainant Consent/Release Form

Name (first, middle, last)	Telephone number () -
Address (number and street, county, state, ZIP code)	
Case number(s) (if known)	
<p>As a complainant, I understand that during an investigation it may become necessary for Noble County to reveal my identity to individuals outside of Noble County Government in the course of verifying information or gathering facts and evidence to develop a basis for making a civil rights compliance determination. I understand that it may be necessary for Noble County to share information, including personal details collected as part of its complaint investigation. In addition, I understand that as a complainant, I am protected by Title VI of the Civil Rights Act of 1964, as amended, and its related statutes and regulations prohibiting intimidation or retaliation for taking action or participating in an action to secure rights protected by the nondiscrimination statutes enforced by the Noble County.</p>	
<p>Please read both paragraphs below, check your choice of CONSENT or CONSENT DENIED, and sign below.</p>	
<p>CONSENT</p> <p>I have read and understand the above information and authorize Noble County to disclose my identity to individuals as needed during the course of the investigation for the purpose of verifying information or gathering facts and evidence relevant to the investigation of my complaint. I authorize Noble County to receive, review, and discuss material and information about me relevant to the investigation of my complaint. I understand that the material and information will be used for authorized civil rights compliance and enforcement activities. I further understand that I am not required to authorize this release and volunteer to do so.</p>	
<p>CONSENT DENIED</p> <p>I have read and understand the above information and do not want Noble County to disclose my identity to any individual during the course of the investigation. I understand this choice could delay the investigation of my complaint and may, in some circumstances, result in an administrative closure of the investigation of my complaint without Noble County making a determination in my case.</p>	
Signature	Date (month, day, year)
<p>You may return this form by mailing/emailing it to: Jackie Knafel, 109 N. York Street, Albion, IN 46701 Phone: 260-636-2658, Fax: 260-636-4001, E-mail: jackie.knafel@nobleco.gov</p>	

APPENDIX F - Voluntary Public Involvement Survey

As a recipient of Federal funds, the Indiana Department of Transportation (INDOT) is requiring local agencies to develop a procedure for gathering statistical data regarding participants and beneficiaries of its Federal-aid highway programs and activities (23 C.F.R. § 200.9(b)(4)). Noble County 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 Noble County 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 Noble County's responsibilities under Title VI of the Civil Rights Act of 1964, as amended, or the Americans with Disabilities Act, please contact the Title VI/ADA Coordinator or you may return the survey by folding it and placing it on the designated table or by mailing/emailing it to: Jackie Knafel, Title VI Coordinator, 109 N. York Street, Albion, IN 46701, 260-636-2658 or jackie.knafel@nobleco.gov.

Date (month, day, year):	
Event/Project:	
Gender: <input type="checkbox"/> Female <input type="checkbox"/> Male	
Race: (check one or more) <input type="checkbox"/> American Indian or Alaska Native <input type="checkbox"/> Asian Native Hawaiian or Other Pacific Islander <input type="checkbox"/> White <input type="checkbox"/> Black or African-American <input type="checkbox"/> Multiracial	Ethnicity : <input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Not Hispanic or Latino <input type="checkbox"/> Other
Age: <input type="checkbox"/> 1-21 <input type="checkbox"/> 22-40 <input type="checkbox"/> 41-65 <input type="checkbox"/> 65+	Disability: <input type="checkbox"/> Yes <input type="checkbox"/> No
Is English your preferred language? <input type="checkbox"/> Yes <input type="checkbox"/> No If no, what is your preferred language? _____	
Household Income: <input type="checkbox"/> \$0-\$12,000 <input type="checkbox"/> \$12,001-\$24,000 <input type="checkbox"/> \$24,001-\$36,000 <input type="checkbox"/> \$36,001-\$48,000 <input type="checkbox"/> \$48,001-\$60,000 <input type="checkbox"/> \$60,001+	

APPENDIX G – I-Speak Cards

Language Identification Cards

Side 1 of 2

Instructions: Place a check by the language spoken.

<input type="checkbox"/> Mark this box if you read or speak English.	<i>English</i>
<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	<i>Arabic</i>
<input type="checkbox"/> Խովհանով ենք՝ կատարեց այս քառակուսով՝ եթե խոսում կամ՝ կարդում եք հայերեն։	<i>Armenian</i>
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	<i>Bengali</i>
<input type="checkbox"/> ល្អមិនភ្លាត់ក្នុងប្រអប់នេះ បែង្ហាញអាគង់ប្រុង បុទ្ធសាស្ត្រ។	<i>Cambodian</i>
<input type="checkbox"/> Motka i kahhon ya yangin untuungnu' manaitai pat untuungnu' kumentos Chamorro.	<i>Chamorro</i>
<input type="checkbox"/> 如果你能读中文或讲中文, 请选择此框。	<i>Simplified Chinese</i>
<input type="checkbox"/> 如果你能讀中文或講中文, 請選擇此框。	<i>Traditional Chinese</i>
<input type="checkbox"/> Označite ovaj kvadratič ako čitate ili govorite hrvatski jezik.	<i>Croatian</i>
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	<i>Czech</i>
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	<i>Dutch</i>
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	<i>Farsi</i>
<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	<i>French</i>
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	<i>German</i>
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	<i>Greek</i>
<input type="checkbox"/> Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	<i>Haitian Creole</i>
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	<i>Hindi</i>
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	<i>Hmong</i>
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérte vagy beszéli a magyar nyelvet.	<i>Hungarian</i>

Source: *Language Identification Flashcard - 2004 Census Test*
 U.S. Census Bureau, Economics and Statistics Administration, U.S. Department of Commerce
www.lep.gov/ISpeakCards2004.pdf

AOC
2012

Language Identification Cards

Side 2 of 2

Instructions: Place a check by the language spoken.

<input type="checkbox"/> Marchi questa casella se legge o parla italiano.	<i>Italian</i>
<input type="checkbox"/> 日本語を読んだり、話せる場合はここに印を付けてください。	<i>Japanese</i>
<input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	<i>Korean</i>
<input type="checkbox"/> ທີ່ມາຕົລະເຊີ້ນ ຕ່າງໆມາດ້ວຍທີ່ມາຕົລະເຊີ້ນ.	<i>Laotian</i>
<input type="checkbox"/> Kakölleiki bōq (box) in elāññe kwójela kajin im waakin (read) majōl.	<i>Marshallese</i>
<input type="checkbox"/> Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	<i>Polish</i>
<input type="checkbox"/> Assinale este quadrado se você lê ou fala português.	<i>Portuguese</i>
<input type="checkbox"/> Însemnați această căsuță dacă citiți sau vorbiți românește.	<i>Romanian</i>
<input type="checkbox"/> Пометьте этот квадратик, если вы читаете или говорите по-русски.	<i>Russian</i>
<input type="checkbox"/> Обележите овај квадратик уколико читате или говорите српски језик.	<i>Serbian</i>
<input type="checkbox"/> Označte tento štvorček, ak viete čítať alebo hovoríť po slovensky.	<i>Slovak</i>
<input type="checkbox"/> Marque esta casilla si lee o habla español.	<i>Spanish</i>
<input type="checkbox"/> Markahan itong kuadrado kung kaya ay marunong magbasa o magsalita ng Tagalog.	<i>Tagalog</i>
<input type="checkbox"/> ໃໝ່ກ່າວເກີ່ມຂົງມານມາເລັງໃນໜຶ່ງນີ້ກ່າວເກີ່ມຂົງມານກ່າວເກີ່ມຂົງມານ.	<i>Thai</i>
<input type="checkbox"/> Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	<i>Tongan</i>
<input type="checkbox"/> Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	<i>Ukrainian</i>
<input type="checkbox"/> اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	<i>Urdu</i>
<input type="checkbox"/> Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	<i>Vietnamese</i>
<input type="checkbox"/> באציגו נט דעם קעסטל אויב אויר ליענט אדער רעדט אידיש.	<i>Yiddish</i>

Source: *Language Identification Flashcard - 2004 Census Test*
 U.S. Census Bureau, Economics and Statistics Administration, U.S. Department of Commerce
www.2010.census.gov/2010census/lep/www/lep.gov/ISpeakCards2004.pdf

AOC
2012

Language Identification Cards

Side 1 of 2

Instructions: Place a check by the language spoken.

<input type="checkbox"/> Mark this box if you read or speak English.	<i>English</i>
<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	<i>Arabic</i>
<input type="checkbox"/> Խոսում ենք ԱՀԱ կատարեք այս քառակուսում՝ եթե խոսում կամ կարդում եք հայերեն։	<i>Armenian</i>
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	<i>Bengali</i>
<input type="checkbox"/> សូមបញ្ជាក់តើអ្នកបានចូលរួមការប្រជុំខ្លួន។	<i>Cambodian</i>
<input type="checkbox"/> Motka i kahhon ya yangin untuñgnu' manaitai pat untuñgnu' kumentos Chamorro.	<i>Chamorro</i>
<input type="checkbox"/> 如果你能读中文或讲中文, 请选择此框。	<i>Simplified Chinese</i>
<input type="checkbox"/> 如果你能讀中文或講中文, 請選擇此框。	<i>Traditional Chinese</i>
<input type="checkbox"/> Označite ovaj kvadratič ako čitate ili govorite hrvatski jezik.	<i>Croatian</i>
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	<i>Czech</i>
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	<i>Dutch</i>
<input type="checkbox"/> اگر خواندن و نوشتمن فارسی بلد هستید، این مربع را علامت بزنید.	<i>Farsi</i>
<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	<i>French</i>
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	<i>German</i>
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	<i>Greek</i>
<input type="checkbox"/> Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	<i>Haitian Creole</i>
<input type="checkbox"/> आगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	<i>Hindi</i>
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	<i>Hmong</i>
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérte vagy beszéli a magyar nyelvet.	<i>Hungarian</i>

APPENDIX H - Title VI Goals & Accomplishments Report

Noble County will submit its Title VI goals and accomplishments Report to INDOT annually no later than October 1st, based on the following:

1. Implement compliance and annual reviews of the Title VI plan, making revisions as needed.
2. Review minority participation and examine appropriate methods of encouraging minority participation in county events and activities.
3. Review demographic information relative to the community and provide cost efficient methods of facilitating alternative language formats for those with LEP.
4. Ensure employees have received training on Title VI policies and procedures.

Title VI Reporting/Accomplishments

- Provide Training Materials to Department Heads on Title VI Program and LEP Plan: 06/06/2025
- Update Title VI Policy: 05/27/2025
- Placement of Updated Title VI Implementation Plan and forms on Noble County Website: 06/23/2025
- INDOT Title VI Training for Title VI Coordinator: 9/22/2025

Title VI Goals

- Train employees on Title VI: Ongoing
- Identify sub-recipients: 08/15/2026
- Provide training materials to sub-recipients: 08/15/2026
- Review all programs for Title VI implications: 08/15/2026
- Update Title VI plan as needed and post on website with new revision date: 09/15/2026

APPENDIX I – Title VI – Staff Acknowledgement Form & Training Materials

Noble County

Title VI Nondiscrimination & ADA Training Program

The following employees have signed below indicating they have reviewed the Title VI Nondiscrimination and ADA Training with an understanding that all necessary forms, resources and updated plans are available for employee and public review (at any time) at the County Auditor's office or the County's website.

MANAGER INSTRUCTIONS: **You may use more than one form to complete your department's signatures.

Once all department employees have received training (and verified on this form), please scan this sheet via email to:

ADA Coordinator, Zack Smith, 109 N. York Street, Albion, IN 46701, Phone 260-636-7877, Fax 260-636-4001, or E-mail zack.smith@nobleco.gov

or

Title VI Coordinator: Jackie Knafel, 109 N. York Street, Albion, IN 46701, Phone: 260-636-2658, Fax: 260-636-4001, E-mail: jackie.knafel@nobleco.gov

If you elect to utilize email verification as your documentation, please print the emails documenting training received from the trained employee and forward to the ADA/Coordinator.

NOBLE COUNTY - Title VI Implementation Plan

<p>ADA /TITLE VI ANNUAL EMPLOYEE TRAINING</p>	<p>Why must Local Public Agencies demonstrate compliance with ADA/Section 504?</p> <p>A state or local government with 50 employees or more is required to:</p> <ul style="list-style-type: none"> Designate a County ADA Coordinator Establish an ADA Transition Plan Complete a self-evaluation of facilities, programs, and activities Develop an ADA Transition Plan Train a knowledgeable public official Review Title VI compliance 	<p>Who is protected by the ADA?</p> <p>Persons with a physical or mental impairment that substantially limits one or more major life activities:</p> <ul style="list-style-type: none"> A person with a cognitive, hearing, impairment ADA only protects a person qualified for the job whether has or needs Qualified individuals must have functional impairment Must be able to perform the job's essential functions 												
1	4	7												
<p>Agenda</p> <p>Introductions Americans with Disabilities Act ADA Title VI Coordinator Why this training is important? Compliance Exercise Title VI Dissemination Q&A</p>	<p>Why is this training important?</p> <p>In 1990, Federal funds through grant programs, federal grants, etc., are now REQUIRED to disabilities. Disabilities must be consistent with these requirements, OR we risk losing our Federal funding assistance.</p>	<p>Barriers and How to Identify Them</p> <p>Physical accommodations, too tall or wide enough, etc./ "Slopes" Drinking fountain Mobile Paper Towel Dispenser Conventional doorways and opening controls Communication (Visual, Oral, Written) Lack of ADA accessible signs Mobile Phone Stairs and Language barrier</p>												
2	5	8												
<p>WHAT IS AMERICANS WITH DISABILITIES ACT?</p> <p>Protects discrimination and provides the public with disabilities from the public discrimination. It protects the public with disabilities from discrimination in employment, state and local government, services, private businesses, telecommunications, and transportation.</p> <p>The reason they must be able to enjoy employment opportunities, to purchase goods and services, and to participate in all state and local government programs and services.</p> <p>ADA AMERICANS WITH DISABILITIES ACT</p>	<p>What is ADA's Purpose?</p> <ul style="list-style-type: none"> Ensure that people with disabilities have equal opportunities to participate in and benefit from programs and services. Give people with disabilities the same opportunities as others. Guarantee equal opportunities for individuals with disabilities. Provide <u>reasonable</u> accommodation of employment practices. 	<p>Other Physical Barrier Examples</p> <p>Examples of what an employee may notice and characteristics the ADA/Title VI Coordinator:</p> <table border="1"> <tr> <td>Stairs</td> <td>Handicap accessible</td> <td>Under step</td> </tr> <tr> <td>Mobile</td> <td>Handicap accessible</td> <td>Handicap accessible</td> </tr> <tr> <td>Mobile</td> <td>Handicap accessible</td> <td>Handicap accessible</td> </tr> <tr> <td>Mobile</td> <td>Handicap accessible</td> <td>Handicap accessible</td> </tr> </table>	Stairs	Handicap accessible	Under step	Mobile	Handicap accessible	Handicap accessible	Mobile	Handicap accessible	Handicap accessible	Mobile	Handicap accessible	Handicap accessible
Stairs	Handicap accessible	Under step												
Mobile	Handicap accessible	Handicap accessible												
Mobile	Handicap accessible	Handicap accessible												
Mobile	Handicap accessible	Handicap accessible												
3	6	9												
<p>ADA Notice: Program Accessibility</p> <p>Examples of the Target Audience for the ADA Notice</p> <ul style="list-style-type: none"> in public or a public forum in a place of public accommodation in a government program, activity, or function in a place of employment in a place of public gathering in a place of public assembly in a place of public accommodation <p>Notice Noble County ADA: An electronic format is available at http://www.noblecountiowa.org/ada/ and http://www.noblecountiowa.org/ada/ada.html. ADA documents are available at http://www.noblecountiowa.org/ada/ada.html. ADA Coordinator: Diane Schmitz at 712-626-7077 or Diane.Schmitz@noblecountiowa.org</p>	<p>ADA Work Group & Role</p> <p>ADA Committee: Chair County Member County Auditor County Attorney County Sheriff</p> <p>Having a working ADA group is important to help the County maintain its compliance. Members of the group (one, or a few) open several functions to the public to help the group to be successful.</p> <p>ADA Work Group: Work together to leverage the resources members skills, experience, and knowledge in matters involving ADA compliance and accessibility.</p>	<p>For Department Heads: What is A "Reasonable Accommodation"?</p> <p>REASONABLE ACCOMMODATIONS</p> <p>The ADA and the Title VI of the Civil Rights Act of 1964 prohibit discrimination on the basis of disability in all programs and activities of the County. Reasonable accommodations are changes in policies, practices, or procedures that do not impose an undue burden on the County. Reasonable accommodations are changes in policies, practices, or procedures that do not impose an undue burden on the County. Reasonable accommodations are changes in policies, practices, or procedures that do not impose an undue burden on the County.</p>												
10	13	16												
<p>Summarized Non-Discrimination Statement</p> <p>"In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the County will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities."</p> <p>Area to the statement will soon be added to the County website and posted in common areas of County facilities.</p>	<p>ADA Coordinator Role</p> <p>County ADA Coordinator: Name: Diane Schmitz Title: ADA Coordinator Address: 100 N. Main Street Phone: 712-626-7077 Email: Diane.Schmitz@noblecountiowa.org</p> <ul style="list-style-type: none"> Monitoring the County's ADA Transition Plan Monitoring established procedures Conduct review of ADA program areas Conduct ADA training programs ADA outreach for dissemination to the general public Monitoring, investigating, and addressing ADA discrimination 	<p>EMPLOYER-Reasonable Accommodation Examples</p> <ul style="list-style-type: none"> Making existing facilities accessible Job restructuring/modifying work schedules, reassignment to a vacant position Acquiring or modifying equipment, devices, materials, or policies Relocating or reassigning work schedules 												
11	14	17												
<p>ADA & Title VI Coordinators</p> <p>ADA Coordinator: Name: Diane Schmitz Title: ADA Coordinator Address: 100 N. Main Street Phone: 712-626-7077 Email: Diane.Schmitz@noblecountiowa.org</p>	<p>Recognizing Disabilities Covered Under ADA</p> <p>Disabilities can include, but are not limited to, physical, mental, cognitive, or emotional impairments that substantially limit a major life activity.</p> <p>ADA Coordinator: Name: Diane Schmitz Title: ADA Coordinator Address: 100 N. Main Street Phone: 712-626-7077 Email: Diane.Schmitz@noblecountiowa.org</p>	<p>Undue Hardship: What if it costs too much to accommodate?</p> <ul style="list-style-type: none"> An employee does not have to provide a reasonable accommodation An employee is not required to have equal or substantially equal to make an accommodation Example of Undue Hardship: http://www.ada.gov/unduehardship.htm 												
12	15	18												

NOBLE COUNTY - Title VI Implementation Plan

Other Accommodations: Program Accessibility

Program accessibility may be achieved in a variety of ways. County facilities are often accessible. However, some buildings or areas are not accessible. The County has a commitment to provide accessible educational opportunities and programs for accessibility.

ADA Self-evaluations:

What to look for...

- High pedestrian traffic areas (County facilities, parks, etc.)
- Areas of facilities frequently used by the public (Malls, County Courthouses, etc.)
- Areas/physical barriers that might restrict access to individuals with disabilities that should be considered.

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ADA Self-evaluations:

What to look for...

- High pedestrian traffic areas (County facilities, parks, etc.)
- Areas of facilities frequently used by the public (Malls, County Courthouses, etc.)
- Areas/physical barriers that might restrict access to individuals with disabilities that should be considered.

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ADA Self-evaluations:

This is conducted every 3 years

- Newly added buildings, programs, or services

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IMPORTANT: Public Complaints for ADA Access

If a COMPLAINT regarding ADA ACCESSIBILITY to Noble County services is received:

- Complainant indicates the County facilities in physical locations where they complain is not accessible.
- Provide form with the ADA Coordinator:

ADA Coordinator
Zack Smith
Title VI Coordinator
ADA Coordinator
Phone: 507-344-4375
Email: zsmith@noble.k12.mn.us

If the individual continues to complain, or if you are not able to handle the situation, contact the Title VI Coordinator.

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ADA Self-evaluations:

When evaluating your area, where do we start?

- Identify
- Determine facilities with the public with ADA complaints
- Decide when and how to arrange for auxiliary aids and services
- Review service, activity, and program policies and procedures
- Survey facilities and determine whether there are physical barriers to accessing programs

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ADA Self-evaluations:

Frequently Asked Questions (Public ROW)

- What if a County building is not open to the public?
- If the existing website scope before implementing the ADA, do we still need to maintain a hard copy?
- Q: I have to worry about the internet connection?

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ADA Self-evaluations: Priorities for Accessible Facilities – What we look for?

KEEP IN MIND

This checklist follows the four priorities in the Department of Justice ADA Title II regulations for facilities that are open to the public, applicable to state and local government facilities:

- Priority 1: Accessible approaches and entrances
- Priority 2: Accessible routes and areas
- Priority 3: Accessible public areas
- Priority 4: Access to other areas, including areas outside

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ADA Self-evaluations:

What are some Physical Accessibility to Facilities Used by the Public

The following list of facilities should not only be evaluated but also reported by County employees for non-compliance:

- Streets
- Walkways
- Parking Spaces
- Stairs
- Escalators
- Stairs and landings
- Doors
- Handrails
- Handicap signage
- Public Counters/areas where business is conducted

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discrimination

TITLE VI: Non-Discrimination

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Civil Rights: Restoration Act of 1987

The year of the Title VI "restudy" concluded...

TITLE VI Civil Rights Act

Title VI includes the programs and activities of federal agencies and contractors, including state and local governments.

28

Important Changes that Impact YOU

PUBLIC MEETINGS

Washington Title VI Public Involvement Survey

We are a recipient of federal funds, which requires the County to provide public notice of all actions the County generally takes with regard to participants in County activities.

Resolutions have passed at www.noble.k12.mn.us and www.noble.k12.mn.us for the purpose of maintaining our perspective with the public.

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Title VI: Contractors to the County

Any and all contractors for federal grants/programs/activities will include language that requires the County to conduct Title VI in compliance with Title VI.

Contractors are required to maintain and implement Title VI and maintain the outcome of the review for compliance.

If you contract with any company that generates agency data for the County, please make sure that the company has a Title VI Coordinator and is following the Title VI contractor and subcontractor compliance guidelines.

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What is Title VI Purpose?

- The law is intended to end the incidents of discrimination.
- The primary purpose of Title VI is "to prevent discrimination".

ITLE VI Non-Discrimination Awareness

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Important Changes that Impact YOU

PUBLIC COMPLAINTS-TITLE VI DISCRIMINATION

For a complaint in your department, receive a discrimination complaint:

- Identify the complainant
- Be professional and tactful without making any threats
- Call county facilities under their name, title, or name in the Title VI Coordinator
- If the complainant is upset or pressurized, be tactful and let them know that you are there to help them
- A courtesy visit to the Coordinator is preferred when possible
- Keep the complainant informed of the progress of the possible complaint as advised and appreciated

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Next Steps in Training

Department Heads, Financial Officer, and other leaders are required to receive the Title VI training.

For the training to be complete with the requirement:

- The county must have a formal self-evaluation for participation in the Title VI program for a minimum of a 3-year period.
- If the county is found to be in violation of a complaint, the county must take corrective action for the complaint, and a formal self-evaluation for participation in the Title VI program.
- Each county must be up to date on the Title VI program.
- Reserve an open position, or bring back Title VI Coordinators to existing positions.

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How the County Demonstrates Title VI Compliance

• Developed an official Title VI Coordinator

• Developed and put the Title VI policy in public accessibility

• Developed procedures for Title VI complaints and employment practices

• Standard resolution (applied to the Coordinator) for no such discrimination will occur

• Communicate and train our employees on Title VI requirements, including what to do if they receive a complaint.

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FOUR FACTOR ANALYSIS

Required and Demonstrates Title VI Compliance

• Factor One: Disparate Treatment

• Factor Two: Disparate Impact

• Factor Three: Disparate Treatment

• Factor Four: Disparate Impact

• Largely Same: Disparate Treatment

• Largely Same: Disparate Impact

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Thank you for being an advocate for equal access and the fair treatment/nondiscrimination of the citizens we serve.

QUESTIONNAIRE

Title VI Coordinator
Title VI Coordinator
Title VI Coordinator
Title VI Coordinator
Title VI Coordinator

PLEASE DON'T FORGET TO SIGN THE ACKNOWLEDGMENT FORMS BEFORE YOU LEAVE.

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APPENDIX J – Noble County Title VI Adoption

NOBLE COUNTY COMMISSIONER'S RESOLUTION #2025-28

A Resolution of the Board of Commissioners of Noble County, Indiana
Adopting the Title VI Non-discrimination Policy, Coordinator and Procedures

WHEREAS, the Federal government enacted the Americans with Disabilities Act of 1990 (ADA) to prevent discrimination of the physically and mentally disabled relating to employment and access to public facilities;

WHEREAS, a hearing was held on June 23, 2025, before the Noble County Board of Commissioners in which the Title VI Nondiscrimination Policy was presented;

WHEREAS, there was a public comment period after the hearing and no member of the public presented any comments;

WHEREAS, the Indiana Department of Transportation requires that a Title VI Nondiscrimination Policy be adopted by August 10, 2025, for the Noble County to receive future state and/or federal funding for transportation projects;

WHEREAS, in compliance with Title II of the ADA, Noble County, Indiana shall name an ADA & Title VI Coordinator;

WHEREAS, in compliance with Title II of the ADA, Noble County, Indiana shall adopt grievance and complaint procedures for resolving complaints alleging violation of Title II of the ADA; and complaints for Title VI; and

WHEREAS, in compliance with Title II of the ADA, Noble County, Indiana shall publish notice to the public regarding the ADA and Title VI plan; and

NOW, THEREFORE, BE IT RESOLVED by the Noble County Board of Commissioners and of Indiana:

SECTION 1: The County Coordinator/Human Resources Director, who is currently Jackie Knaefel shall be the Title VI Coordinator for Noble County.

SECTION 2: The Noble County Board of Commissioners approves and adopts the Title VI Nondiscrimination Policy herein attached to this Resolution.

SECTION 3: The Noble County Complaint Procedure under the Title VI Implementation Plan is approved.

SECTION 4: In compliance with Federal and State laws as set forth above, Noble County resolves to post the required ADA & Title VI information under the Americans with Disabilities Act on its website and at such other locations as may be determined from time to time.

RESOLVED AND ADOPTED this 23rd day of June 2025.

Noble County Board of Commissioners

By: Gary D. Latherman, President

By: Anita F. Hess, Vice President

By: Gary V. Timmerman, Member

ATTESTED: Shelley Mawhertor
Shelley Mawhertor, Auditor