



**2025**

**TITLE VI IMPLEMENTATION PLAN**

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## **I. Introduction**

This Title VI Implementation Plan is a part of the Randolph 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, Randolph 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**

Randolph 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, Randolph 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 Randolph County on the grounds of race, color, age, sex, sexual orientation, gender identity, disability, national origin, religion, income status or limited English proficiency. Randolph 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 Randolph 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, Randolph 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.

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

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

The following individuals have been identified as Randolph 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:

**Joe Copeland**

2256 S U.S. Highway 27

Winchester, IN 47394

Phone: 765-584-2601

E-mail: [jcopeland@randolph.in.gov](mailto:jcopeland@randolph.in.gov)



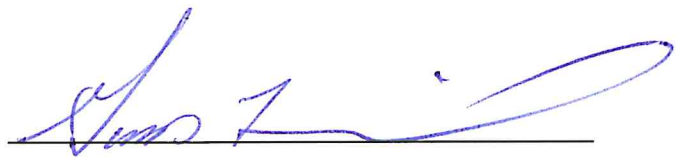
**III. Title VI Assurances & Implementation**

Randolph 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 Randolph County by council acceptance, and it is effective for plan year 2025-26. This plan will be renewed on or before 10/01/2026.

Randolph County, Indiana

Dated 9-15-2025



**Gary Friend**

Randolph County Commissioner President

#### **IV. Organization & Staffing**

Randolph County includes the Elected Officials, the County Council, and the Board of Public Works, and Joe Copeland, Randolph County Engineer, as the ADA/Title VI Coordinator, whose role is responsible for developing and overseeing the Title VI, LEP, and ADA plans, reports, and surveys. The Title VI Coordinator is also 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.

<b>Name</b>	<b>Department</b>	<b>Phone</b>	<b>Email</b>
Joe Copeland	ADA Coordinator	765-584-2601	
Joe Copeland	Title VI Coordinator	765-584-2601	
George Caster	Assessor	765-584-2907	
Laura Martin	Auditor	765-584-6700	
Melinda Peed	Clerk	765-584-6603	
Brenda Tharp	Treasurer	765-584-8508	
Jane Grove	Recorder	765-584-7300	
Jay L Toney	Circuit Court	765-584-4011	
Art L Moystner	County Sheriff	765-584-1721	
Chris Shaneyfelt	Emergency Management (EMA)	765-584-1721	
Bethany 'Dani' Sibert	Veterans Service Officer	765-584-7381	
Julie Wilson	Extension Office	765-584-2271	
Sherri Thompson	Health Department	765-584-1155	
	Public Defender		
Chris Shaneyfelt	E911 Dispatch	765-584-1721	
Gary Friend	Commissioners	765-744-3675	
Gary Friend	IT	765-744-3675	
Auditor's Office	GIS	765-584-2160	
Robert Jessee	Plan Commission	765-584-0275	
	Parks and Recreation		
Melinda Peed	Child Support	765-584-6603	
David Daly	Prosecutor's Office	765-584-2644	
Ed Thornburg	Surveyor	765-584-0609	
Gary Friend	Drainage Board	765-584-0609	
Jay Long	Highway Department	765-584-2601	
Elizabeth Krieg	Probation	765-584-5805	
Rhoda Davis	Court Svcs/Community Corrections	765-584-6276	

**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. Randolph 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=lw0mefqIZ5Y>

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 Randolph County where funding originates from any Federal Assistance programs are subject to the provisions of Title VI. Randolph County will include Title VI language, as per the Standard U.S. DOT Title VI Assurances (Appendices A), 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**

Randolph County will promptly and thoroughly investigate all properly submitted complaints of alleged discrimination. Randolph 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 Randolph 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 Randolph County's Title VI Coordinator. Complaint forms can be found in Appendix D, on Randolph County's website at <https://www.in.gov/counties/randolph> 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. Randolph 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 a 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 Randolph 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 Randolph 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 thorough investigation of complaints inside Randolph 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 Randolph 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, Randolph 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 involved with the investigation.

***Corrective Action***

If Randolph 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, Randolph 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***

Randolph 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 Randolph 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 Randolph 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 Randolph 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 contain 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.

Randolph 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**

Title VI information will be displayed at Randolph County Courthouse and all places in which public meetings are held. The name and contact information of Randolph County Title VI Coordinator will be displayed on Title VI information.

Randolph 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 Randolph County's Website [www.in.gov/counties/randolph](http://www.in.gov/counties/randolph). 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 to public comment and be adopted at a public hearing once approved by the County Commissioners.

Randolph County Commissioners meets bimonthly and County Council meet once a month, and those meetings are open to the public. Any meetings that are open to the public are published on Randolph County's website at [www.in.gov/counties/randolph](http://www.in.gov/counties/randolph) and distributed to local media outlets. All Randolph 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 Randolph County's website are various meeting minutes, and Randolph 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**

Randolph County will collect and analyze statistical information regarding demographics to assist in monitoring and ensuring nondiscrimination in all its programs and activities. Randolph County will utilize a voluntary public involvement survey (Appendix F) 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 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 it is reportable upon request from a funding agency.

Randolph 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, Randolph 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 Randolph County's programs or activities.

For more information regarding the Randolph County's ADA policy, please visit Randolph County's website at [www.in.gov/counties/randolph](http://www.in.gov/counties/randolph). ADA complaint forms can also be obtained on the Randolph County's website or by contacting the Randolph County ADA Coordinator.

**ADA Coordinator**

Joe Copeland  
2256 S U.S.Highway 27  
Winchester, IN 47394  
Phone: 765-584-2601  
E-mail [jcopeland@randolph.in.gov](mailto:jcopeland@randolph.in.gov)

**XII. Limited English Proficiency (LEP) Plan**

Randolph 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 Randolph 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, Randolph 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 people in the service area who may be served or are likely to encounter a Randolph County program, activity or service.
2. The frequency with which LEP people encounter Randolph County programs, activities, and services.
3. The nature and importance of the programs, activities or services provided by



Randolph County to the LEP population; and

4. The resources available to Randolph County and the overall costs to provide LEP assistance.

Using the U.S. Census Bureau's American Community Survey 2023 5- Year Estimates, of the population (24,425) approximately 888 (3.63%) of people in the Randolph County, age 5 years and older, speak English "less than very well."

Breakdown of the population by race:

- White: 22,601 (92.5%)
- Hispanic or Latino (of any race): 1216 (4.9%)
- Multiracial: 415 (1.69%)
- Black or African American: 126 (0.51%)
- Native American / Other: 0 (0.5%)
- Asian: 67 (0.27%)

Randolph County also surveyed its staff regarding the frequency of problems encountered with people that are LEP. These surveys affirmed that Randolph 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 shall utilize a Voluntary Title VI Public Involvement Survey (Appendix F) 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, Randolph County has considered and implemented the following:

- The number or proportion of LEP persons who may be served or likely to encounter a Randolph County program, activity or service is approximately 3.63%, slightly higher than surrounding counties.
- The frequency with which LEP people encounter Randolph County programs, activities, or services is very low, based on our staff survey.
- To ensure meaningful access to LEP persons pertaining to any Randolph County programs, activities, and services, the county offers free interpretation services, as needed or requested, forty-eight (48) hours in advance.

Randolph 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**

Randolph 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, The 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.

**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 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 Assurances**

Randolph County (hereinafter referred to as the "Recipient") HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d-42 USC 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 59, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations) and other pertinent directives, to the end that is in accordance with the Act, Regulations, and other pertinent directives, 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 the Federal Aid Transportation Program and, HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21 .7(a)(1) of the Regulations.

Specifically, and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to the Federal Aid Transportation Program:

1. The Recipient agrees that each "program" and each "facility" as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (regarding a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. The Recipient shall insert the following notification in all solicitations or bids for work or material subject to the Regulations and made in connection with the Federal Aid Transportation Program in adapted form and all proposals for negotiated agreements:

Recipient, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary. Part 21, Nondiscrimination in Federally assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the ground of race, color, or national origin in consideration for an award.

1. That the Recipient shall insert the clauses of Appendix A of this assurance in every contract subject to the Act and the Regulations.
2. That the Recipient shall insert the clauses of Appendix B of this assurance as a covenant running with the land, in any deed from the United States effecting transfer of real property, structures, or improvements thereon, or interest therein.
3. Where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection therewith.
4. 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.
5. That the Recipient shall include the appropriate clauses set forth in Appendix C of this Assurance as a covenant running with the land, in any future deeds, leases, permits, licenses and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under the Federal Aid Transportation Program;  
and (b) for the construction or use of or access to space on, over, or under real

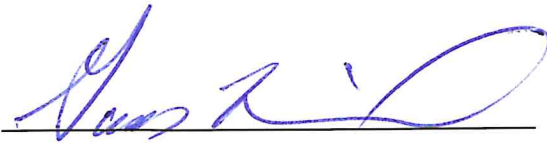


property acquired or improved under the Federal Aid Transportation Program.

6. 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 period: (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.
7. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, subrecipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this Assurance.
8. The Recipient agrees that the United States has a right to seek judicial enforcement regarding any matter arising under the Act, the Regulations, and this Assurance.

This Assurance is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Recipient by the U.S. Department of Transportation under the Federal Aid Transportation Program and is binding on it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest and other participants in the Federal Aid Transportation Program. The person or persons whose signature(s) appear below are authorized to sign this Assurance on behalf of the Recipient.

**Randolph County, Indiana**



Date: 9-15-2025

**Gary Friend**

Randolph County Commissioner President

**XVI. Title VI Goals & Accomplishments**

As provided in Appendix H, Randolph County will submit its Title VI goals and accomplishments Report to INDOT annually no later than August 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***

- Implement Title VI Policy: 10/01/2025
- Train Department Heads on Title VI Program and LEP Plan: 10/01/2025
- Rewrite Title VI Policy: 10/01/2025
- Placement of Title VI Implementation Plan and forms on Randolph County Website: [www.in.gov/counties/randolph](http://www.in.gov/counties/randolph) 10/01/2025

***Title VI Goals***

- Train employees on Title VI: Ongoing
- Identify sub-recipients: 10/01/2026
- Provide training for sub-recipients: 10/01/2026
- Publish Title VI Statement annually in the local newspaper: 10/01/2026
- Review programs for Title VI implications: 10/01/2026
- Update Title VI plan as needed and post on website with new revision date: 10/01/2026



**APPENDIX A – Title VI- Standard DOT Assurances**

Randolph County (hereinafter referred to as the "Recipient") HEREBY AGREES THAT as a condition to receiving any Federal financial assistance from the Department of Transportation and the Federal Highway Administration, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d-42 USC 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations (CFR), Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964, Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes – Implementation and Review Procedures (hereinafter referred to as the Regulations) and other pertinent nondiscrimination authorities and directives, to the end that in accordance with the Act, Regulations, and other pertinent nondiscrimination authorities and directives, no person in the United States shall, on the grounds of religion, race color, or national origin, sex (23 USC 324), sexual orientation, gender identity (Executive Order 13672), age (42 USC 6101), disability/handicap (29 USC 790) and low income (Executive Order 12898) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by Title 49 Code of Federal Regulations, subsection 21.7(a)(1) and Title 23 Code of Federal Regulations, section 200.9(a) (1) of the Regulations, copies of which are attached.

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

1. That the Recipient agrees that each "program" and each "facility as defined in 49 CFR subsections 21.23(e) and (b) and 23 CFR 200.5(k) and (g) of the Regulations, will be conducted (regarding a "program") or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, 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.

The Randolph 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 Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office the Secretary, Part 21,

Nondiscrimination in Federally assisted programs of the Department of Transportation and Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes, issued pursuant to such Acts, hereby notifies all bidders that it will affirmatively insure that in any contact entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of religion, race, color, national origin, sex, sexual orientation, gender identity, age, disability/handicap and low income in consideration for an award.

3. That the Recipient shall insert the clauses of Appendix A of this assurance in every contract subject to the Acts and the Regulations.
4. That the Recipient shall insert the Granting Clause of this assurance, 'as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. Where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.
7. That the Recipient shall include the appropriate clauses set forth in Habendum Clause of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under the Federal-Aid Highway Program; and (b) for the construction or use of or access to space on, over or under real property acquired, or improved under the Federal-Aid Highway Program.
8. That this assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other recipients,



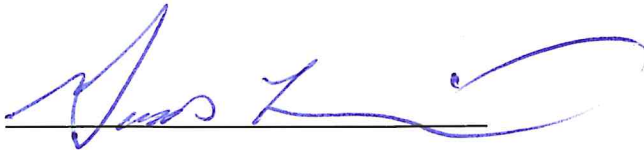
## RANDOLPH COUNTY - Title VI Implementation Plan

subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.

10. The Recipient agrees that the United States has a right to seek judicial enforcement regarding any matter arising under the Act, the Regulations, and this assurance.

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

Randolph County, Indiana



**Gary Friend**

Randolph County Commissioner President

Date: 9-15-2025



**[For insertion in all county contracts (below)]**

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 Randolph 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 by a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall certify to Randolph County 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, Randolph County 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 Randolph 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 Randolph County to enter into such litigation to protect the interests of the Randolph County and, in addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.



**Clauses For Deeds Transferring United States Property**

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

**(Granting Clause)**

NOW, THEREFORE, the U.S. Department of Transportation, as authorized by law, and upon the condition that the Randolph 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 FHWA, also in accordance and 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 and Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 USC § 200d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Randolph 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 the Randolph 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 the Randolph County, Indiana, its successors and assigns.

The Randolph 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, sex, age, disability, or low income be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]\* (2) that the Randolph 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, Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes - Implementation and Review Procedures, and as said Regulations and Acts be amended[, and (3) that in the event of breach of any of the above-mentioned nondiscrimination conditions, the Department shall have a right to 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.)

**Clauses For Transfer of Real Property**

**ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM**

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

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his 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 in the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation program or activity is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964, Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes – Implementation and Review Procedures, and as said Regulations may be amended.

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

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

[Include in deed] \*

That in the event of a breach of any of the above nondiscrimination covenants, the Indiana Department of Transportation shall have the right to re-enter said lands and facilities thereon, and the above-described lands and facilities shall thereupon revert to and vest in and become the absolute property of INDOT 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.)

**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 or agreements entered by Randolph County and/or its subrecipient(s) 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 Nondiscrimination covenants, the [Randolph County and/or its subrecipient(s)] will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-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, the [Randolph County and/or its subrecipient(s)] will there upon revert to and vest in and become the absolute property of [Randolph County and/or its subrecipient(s)] 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.)

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 nondiscrimination statutes and authorities, including but not limited to:



**Pertinent Non-Discrimination Authorities:**

- Title VI of the Civil Rights Act of 1964 (42 USC § 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 USC § 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 USC § 324 et seq.), (prohibits discrimination on the basis of sex).
- Section 504 of the Rehabilitation Act of 1973, (29 USC § 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 USC § 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 USC § 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, prohibits from discriminating because of sex in education programs or activities (20 USC 1687 et seq).

## APPENDIX B - Complaint Log

[illegible]



## 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 Randolph 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 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.in.gov/counties/randolph](http://www.in.gov/counties/randolph) 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 complaints 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:

**Joe Copeland**

2256 S U.S. Highway 27

Winchester, IN 47394

Phone: 765-584-2601

E-mail: [jcopeland@randolph.in.gov](mailto:jcopeland@randolph.in.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 Randolph 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 Randolph 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. Randolph 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 Randolph 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 Randolph County Title VI Coordinator:

**Joe Copeland**

2256 S U.S. Highway 27

Winchester, IN 47394

Phone: 765-584-2601

E-mail: [jcopeland@randolph.in.gov](mailto:jcopeland@randolph.in.gov)



## RANDOLPH COUNTY - Title VI Implementation Plan

Please submit this form to: **Joe Copeland**, 2256 S U.S. Highway 27, Winchester, IN 47394, Phone: 765-584-2601, E-mail: jcopeland@randolph.in.gov, or *your complaint cannot be processed without your signature.*

Name of complainant		Date	
Signature of complainant			
<b>Complainant Information</b>			
Name (first, middle, last)			
Address (number and street, county , state, ZIP code)			
Home phone number (     )     -	Work phone number (     )     -	Cellular phone number (     )     -	
<b>Person/Department you believe Discriminated Against You</b>			
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.		
<b>Provide the names of any individuals with additional information regarding your</b>		
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 Randolph County to reveal my identity to individuals outside of Randolph County Government in the course of verifying information or gathering facts and evidence to develop a basis for making civil rights compliance determination. I understand that it may be necessary for Randolph 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 acting or participating in an action to secure rights protected by the nondiscrimination statutes enforced by Randolph County.</p>	
<p>Please read both paragraphs below, check your choice of CONSENT or CONSENT DENIED, and sign below.</p> <p><b>CONSENT</b></p> <p>I have read and understand the above information and authorize Randolph 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 Randolph 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><b>CONSENT DENIED</b></p> <p>I have read and understand the above information and do not want Randolph 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 Randolph County deciding in my case.</p>	
Signature	Date (month, day, year)
<p>You may return this form by mailing/emailing it to: <b>Joe Copeland</b>, 2256 S U.S. Highway 27, Winchester, IN 47394, Phone: 765-584-2601, E-mail: jcopeland@randolph.in.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)). Randolph 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 Randolph 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 Randolph 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: **Joe Copeland**, 2256 S U.S. Highway 27, Winchester, IN 47394, Phone: 765-584-2601

E-mail: [jcopeland@randolph.in.gov](mailto:jcopeland@randolph.in.gov).

<b>Date (month, day, year):</b>	
<b>Event/Project:</b>	
<b>Gender:</b> <input type="checkbox"/> Female <input type="checkbox"/> Male	
<b>Race:</b> (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	<b>Ethnicity :</b> <input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Not Hispanic or Latino <input type="checkbox"/> Other
<b>Age:</b> <input type="checkbox"/> 1-21 <input type="checkbox"/> 22-40 <input type="checkbox"/> 41-65 <input type="checkbox"/> 65+	<b>Disability:</b> <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? _____	
<b>Household Income:</b> <div style="display: flex; justify-content: space-between; padding: 5px;"> <span><input type="checkbox"/> \$0-\$12,000</span> <span><input type="checkbox"/> \$12,001-\$24,000</span> <span><input type="checkbox"/> \$24,001-\$36,000</span> </div> <div style="display: flex; justify-content: space-between; padding: 5px;"> <span><input type="checkbox"/> \$36,001-\$48,000</span> <span><input type="checkbox"/> \$48,001-\$60,000</span> <span><input type="checkbox"/> \$60,001+</span> </div>	

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.	English
<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	Arabic
<input type="checkbox"/> Խոսողո՞ւմ ե՞սք խոս՞ում կառարկե՞ք այս քառակուսում, կթե՞խոսում կա՞մ կարդո՞ւմ ե՞ք հայերեն:	Armenian
<input type="checkbox"/> যদি আপনি বাংলা পাড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	Bengali
<input type="checkbox"/> ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	Cambodian
<input type="checkbox"/> Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	Chamorro
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	Simplified Chinese
<input type="checkbox"/> 如果你能讀中文或講中文，請選擇此框。	Traditional Chinese
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	Croatian
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	Czech
<input type="checkbox"/> Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	Dutch
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	Farsi
<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	French
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	German
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάσετε ή μιλάτε Ελληνικά.	Greek
<input type="checkbox"/> Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	Haitian Creole
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	Hindi
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	Hmong
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet.	Hungarian

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](http://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"/> ສອມມາດໃສ່ເຊ່ອງນີ້ ຖ້າທ່ານສາມາດອ່ານຫຼືເວົ້າພາສາລາວ.	<i>Laotian</i>
<input type="checkbox"/> Kakölleiki bọk (box) in elaññe kwōjela 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 hovoriť po slovensky.	<i>Slovak</i>
<input type="checkbox"/> Marque esta casilla si lee o habla español.	<i>Spanish</i>
<input type="checkbox"/> Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	<i>Tagalog</i>
<input type="checkbox"/> ในช่องสี่เหลี่ยมนี้ให้ทำเครื่องหมายถ้าท่านอ่านหรือพูดภาษาไทย.	<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"/> באצייכנט דעם קעסטל אויב איר לייענט 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.lep.gov/ISpeakCards2004.pdf](http://www.lep.gov/ISpeakCards2004.pdf)

AOC  
2012



## **APPENDIX H - Title VI Goals & Accomplishments Report**

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

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

### ***Title VI Reporting/Accomplishments***

- Implement Title VI Policy: 10/01/2025
- Train Department Heads on Title VI Program and LEP Plan: 10/01/2025
- Rewrite Title VI Policy: 10/01/2025
- Placement of Title VI Implementation Plan and forms on Randolph County Website: [www.in.gov/counties/randolph](http://www.in.gov/counties/randolph) 10/01/2025

### ***Title VI Goals***

- Train employees on Title VI: Ongoing
- Identify sub-recipients: 10/01/2026
- Provide training for sub-recipients: 10/01/2026
- Publish Title VI Statement annually in the local newspaper: 10/01/2026
- Review programs for Title VI implications: 10/01/2026
- Update Title VI plan as needed and post on website with new revision date: 10/01/2026

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

### Randolph 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.

Date of Training	Employee Name (Print)	Employee Signature	Department

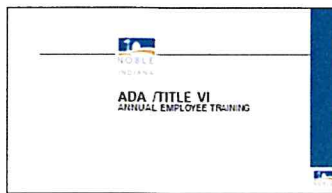
MANAGER INSTRUCTIONS: \*\*You may use more than one form to complete your department's signatures

Once all department employees have received training (and verified on this form), please scan this sheet via email to: **ADA Coordinator, Joe Copeland, 325 S Oak St., Suite 204 Winchester, IN 47394**

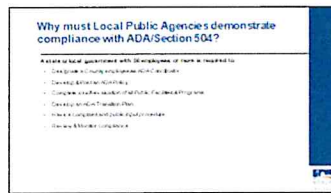
Phone: 765-584-0275 or E-mail : [joe.copeland@Randolphco.gov](mailto:joe.copeland@Randolphco.gov)

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.

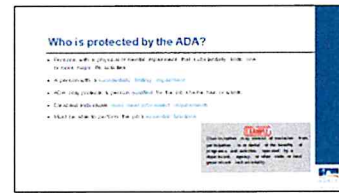
# RANDOLPH COUNTY - Title VI Implementation Plan



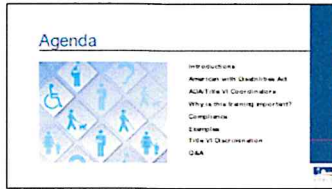
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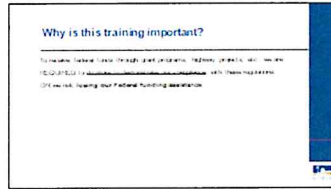
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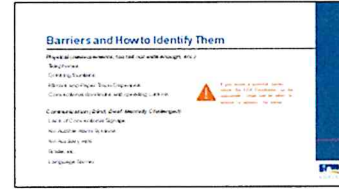
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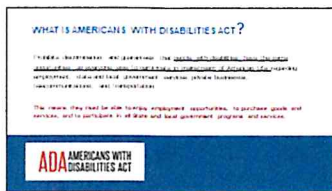
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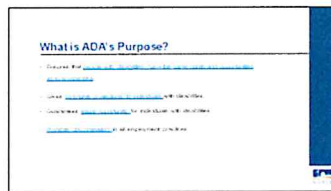
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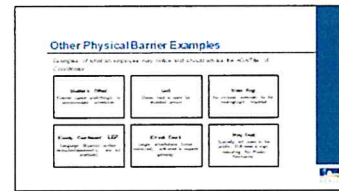
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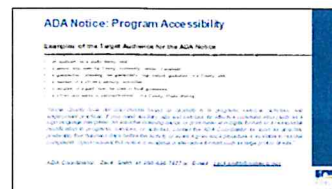
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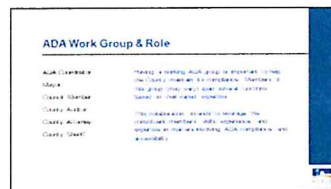
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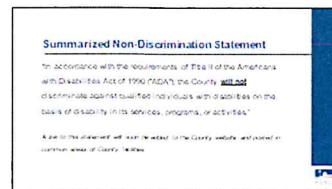
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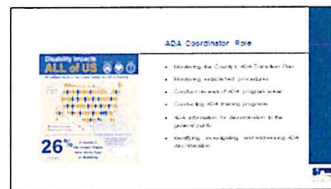
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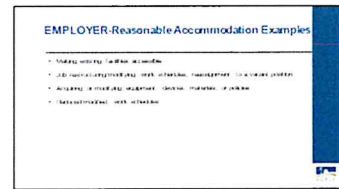
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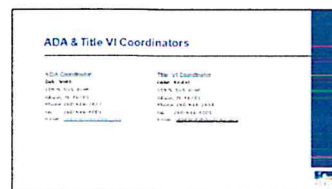
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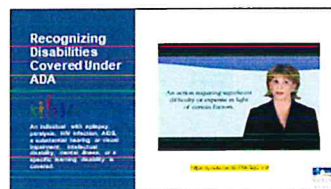
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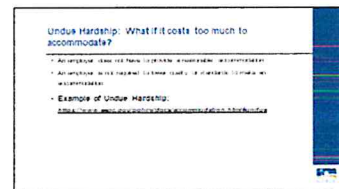
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15



18



# RANDOLPH COUNTY - Title VI Implementation Plan

## Other Accommodations: Program Accessibility

Program Accessibility only is required for County government programs, not for private businesses. The County government can also provide accommodations to private businesses if it chooses to do so.

**Example 1:** The County can provide accommodations to private businesses if it chooses to do so.

**Example 2:** The County can provide accommodations to private businesses if it chooses to do so.

19

## ADA Self-evaluations

What to look for:

- High-potential facilities (County buildings, parks, etc.)
- Recent construction projects (County buildings, parks, etc.)
- County-owned facilities (County buildings, parks, etc.)

22

## ADA Self-evaluations

This is conducted every 3 years.

- Newly added buildings, programs, or services

25

## IMPORTANT: Public Complaints for ADA Access

**How to Report a Complaint:**

- Call the ADA Coordinator at (704) 326-1111.
- Provide the ADA Coordinator with the following information:

- ADA Coordinator
- ADA Coordinator
- ADA Coordinator

20

## ADA Self-evaluations

When evaluating your area, where do we start?

- Identify
- Assess
- Develop
- Implement
- Monitor

23

## ADA Self-evaluations

Frequently Asked Questions (Public ROW)

- What is a County building? Is it open to the public?
- Is the building accessible? Is it open to the public?
- Is the building accessible? Is it open to the public?

26

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

**KEEP IN MIND**

- The County can provide accommodations to private businesses if it chooses to do so.
- The County can provide accommodations to private businesses if it chooses to do so.

21

## ADA Self-evaluations

What are some Priorities for Accessibility to Facilities Used by the Public?

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

- County buildings
- County buildings
- County buildings

24

## Discrimination

**TITLE VI: Non-Discrimination**

27

## Civil Rights: Restoration Act of 1987

The goal of this Act is to "restore the balance"...

**TITLE VI**

28

## Important Changes that Impact YOU

**PUBLIC MEETINGS**

Accessibility Title VI Public Meeting Survey

The purpose of this survey is to gather information about the accessibility of public meetings. The survey is open to all County residents and is confidential.

31

## Title VI: Contractors to the County

Any and all County contractors are required to comply with Title VI of the Civil Rights Act of 1964. This includes all County contractors, regardless of the size of the contract.

34

## What is Title VI Purpose?

The purpose of Title VI is to ensure that all County residents have equal access to County services and programs.

**FROM Non-Discrimination Assurance**

29

## Important Changes that Impact YOU

**PUBLIC COMPLAINTS: TITLE VI DISCRIMINATION**

Public complaints are a key part of the County's Title VI implementation plan. The County will investigate all complaints and take appropriate action to resolve them.

32

## Next Steps in Training

The County will provide training to all County employees on Title VI of the Civil Rights Act of 1964. This training is required for all County employees, regardless of their position.

35

## How the County Demonstrates Title VI Compliance

The County will demonstrate Title VI compliance through a variety of methods, including public meetings, public hearings, and public input.

30

## FOUR FACTOR ANALYSIS

The County will conduct a Four Factor Analysis to assess the impact of its programs and services on different racial and ethnic groups. This analysis will be used to identify areas for improvement and to ensure that all County residents have equal access to County services.

33

## Thank you for being an advocate for equal access and the fair treatment of all people.

**QUESTION?**

The County will provide information on Title VI of the Civil Rights Act of 1964 to all County residents. This information will be available in both English and Spanish.

36

**APPENDIX J – Randolph County Title VI Adoption**

**INSERT ONCE SIGNED**

RESOLUTION 2025-09

A RESOLUTION BY RANDOLPH COUNTY, INDIANA  
APPOINTING THE AMERICANS WITH DISABILITIES ACT (ADA) & TITLE VI  
COORDINATOR AND ADOPTING 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, in compliance with Title II of the ADA, RANDOLPH COUNTY, Indiana shall name an ADA & Title VI Coordinator;

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

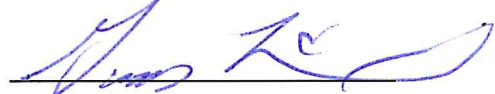
WHEREAS, in compliance with Title II of the ADA, RANDOLPH COUNTY, Indiana shall post the ADA & Title VI coordinator's name, office address, and telephone number along with the ADA & Title VI Notices and grievance procedures on its website.

NOW, THEREFORE, BE IT RESOLVED by RANDOLPH COUNTY, Indiana:

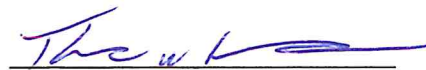
1. Joe Copeland is designated as the ADA & Title VI Coordinator for RANDOLPH COUNTY.
2. The Notice under the Americans with Disabilities Act, a copy of which is attached hereto, is adopted as the Notice under the Americans with Disabilities Act.
3. The ADA Transition Plan Public Input, a copy of which is attached hereto, is adopted as the Public Input notice to the ADA/Title VI Coordinator.
4. The RANDOLPH COUNTY Grievance Procedure under the ADA, a copy of which is attached hereto, is adopted as the grievance procedure for addressing complaints alleging discrimination based on a disability in the provision of services, activities, programs, or benefits by the government agencies of RANDOLPH COUNTY.
5. The RANDOLPH COUNTY Complaint Procedure under the Title VI Implementation Plan.
6. In compliance with Federal and State laws as set forth above, RANDOLPH COUNTY resolves to post the required information regarding the ADA coordinator, notice under the Americans with Disabilities Act, and RANDOLPH COUNTY Grievance Procedure under the Americans with Disabilities Act on its website and at such other locations as may be determined from time to time.
7. The RANDOLPH COUNTY, hereby, adopts the updated ADA Transition Plan and Title VI Implementation Plan.

RESOLVED AND ADOPTED this 15 day of September 2025.

RANDOLPH COUNTY



Gary Friend, Commissioner President



Tom Kerns, Commissioner



Attest:

  
Laura Martin, Auditor

  
Missy Williams, Commissioner