
2025 Indiana Department of Transportation Title VI Implementation Plan



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I. Introduction

Title VI of the Civil Rights Act of 1964, 49 CFR § 26 (“Title VI”) provides that:

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The Civil Rights Restoration Act of 1987 defined the term “program or activity” and “program” to make clear that discrimination is prohibited throughout an entire agency if any part of an agency receives federal financial assistance, rather than just the particular program(s) or activities that receive the federal financial assistance. The United States Department of Transportation (USDOT) and the Federal Highway Administration (FHWA) Regulations 49 Code of Federal Regulations (CFR), Part 21, and 23 CFR, Part 200 respectively, and other applicable Executive Orders and authorities provide guidelines, actions, and responsibilities for State Dot’s implementation of the FHWA Title VI Program.

The Indiana Department of Transportation (“INDOT”) is a recipient of federal funds, and this Title VI Implementation Plan is a part of INDOT’s continual and ongoing effort to proactively meet and exceed the compliance requirements established under Title VI of the Civil Rights Act of 1964 and all related anti-discrimination statutes and regulations.

With this Implementation Plan, INDOT seeks to provide continued transparency, clarity, and technical guidance for internal and external constituents regarding its Title VI program. This Title VI Implementation Plan details the policies and procedures that together comprise INDOT’s Title VI Program. This Plan is intended to be a living document, regularly monitored, and updated by INDOT to meaningfully reflect the program as it advances and expands.

For information related to INDOT’s annual program goals and accomplishments, please refer to INDOT’s Annual Title VI Goals and Accomplishments Report.

KEY DEFINITIONS

Assurance: A written statement or contractual agreement signed by the agency head in which a recipient agrees to administer federally assisted programs in accordance with civil rights laws and regulations.

Beneficiary: Any person or group of persons (other than States) entitled to receive benefits directly or indirectly, from any federally assisted program, i.e., relocates,

impacted citizens, communities, etc.

Compliance: When a recipient has implemented all the Title VI requirements effectively and there is not any evidence of discrimination.

Compliance Reviews: Regular systematic inspections of agency programs are conducted to determine regulatory compliance with civil rights laws and regulations. Compliance reviews determine compliance and non-compliance in the delivery of benefits and services in federally funded programs.

Complaint: A formal notification of alleged discrimination to the proper authority. A complaint consists of facts sufficient to support a claim and should contain enough information to permit an investigation.

Deficiency status: The interim period during which the recipient State has been notified of deficiencies, has not voluntarily complied with Title VI Program guidelines, but has not been declared in noncompliance by the Secretary of Transportation.

Directives: means to establish, communicate, and institutionalize policies, requirements, responsibilities, and procedures for agency and agency departments.

Discrimination: That act (or action) whether intentional or unintentional, through which a person in the United States, solely because of race, color, religion, sex, or national origin, has been otherwise subjected to unequal treatment under any program or activity receiving financial assistance from the Federal Highway Administration under Title 23 U.S.C.

Disparate Impact: Discrimination occurs when a facially neutral policy, procedure, or practice results in different or unequal treatment, and such policy or practice lacks a substantial legitimate justification. Under USDOT regulations, recipients may not, directly or through contractual or other arrangements, utilize criteria or methods of administration that have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.

Disparate Treatment: Intentional discrimination, or disparate treatment, happens when a recipient acts, at least in part, because of the actual or perceived race, color, or national origin of the alleged victims of discriminatory treatment.¹ Discriminatory intent need not be the only motive, but a violation occurs when the evidence shows that the entity adopted a policy at issue “‘because of,’ not merely ‘in spite of,’ its adverse effects upon an

identifiable group.” While one must show that the recipient was motivated by an intent to discriminate, the recipient’s decision-makers do not have to have acted in “bad faith, ill will or any evil motive.

Federal financial assistance and Federal-aid (49 C.F.R. § 21.23(c)):

1. Grants and loans of Federal funds;
2. The grant or donation of Federal property and interests in property;
3. The detail of Federal personnel;
4. The sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and
5. Any Federal agreement, arrangement, or other contract which has as one of its purposes the provision of assistance.

Limited English Proficiency (LEP): Individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service, or benefit provided by a recipient.

Local Public Agency (LPA) (23 C.F.R. § 635.102): any city, county, township, municipality, or other political subdivision that may be empowered to cooperate with the State in highway matters.

Low-Income Population: Any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed or transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy, or activity.

Minority: A culturally, ethnically, or racially distinct group that coexists with but is subordinate to a more dominant group. The race and ethnicity categories below are included in the definition of “Minority” provided by the Council on Environmental Quality Environmental Justice Guidance Under the National Environmental Policy Act, the U.S. Department of Transportation (USDOT) Order 5610.2(a), and FHWA Order 6640.23A.

Noncompliance: A recipient has failed to meet prescribed requirements and has shown an apparent lack of good faith effort in implementing all the Title VI requirements.

Policy: A statement of intent that mandates, specifies, or prohibits conduct in order to:

1. Frame and enhance the agency’s mission, vision, and purpose,

2. Ensure coordinated compliance with applicable laws and regulations,
3. Promote operational efficiency, and/or
4. Reduce the agency's risk.

The policy applies uniformly and consistently across the agency.

Procedure: A description of the standards necessary to implement policy or fulfill the operations of the agency. It includes operational processes, requirements, or directives for the agency.

1. Guidelines
2. Directives/requirements
3. Business Rules
4. Instructions
5. SOP's
6. Manuals
7. Memos/Letters

Programs or Programs and Activities (49 C.F.R. § 21.23(e)): all of the operations of any of the following entities, any part of which is extended federal financial assistance:

- (1) A department, agency, special purpose district, or other instrumentality of a State or a local government; or entity of such State or local government that distributes such assistance and each such department or agency (and each other state or local government entity) to which the assistance is extended, in the case of assistance to a state or local government;
- (2) A college, university, or other postsecondary institution, or a public system of higher education; or local educational agency (as defined in 20 U.S.C. 7801), system of vocational education, or other school system; and
- (3) An entire corporation, partnership, or other private organization, or an entire sole proprietorship if:
 - a. assistance is extended to such corporation, partnership, private organization, or sole proprietorship as a whole; or
 - b. which is principally engaged in the business of providing education, healthcare, housing, social services, or parks and recreation; or
 - c. the entire plant or other comparable, geographically separate facility to which Federal financial assistance is extended, in the case of any other corporation, partnership, private organization, or sole proprietorship; or
 - d. any other entity that is established by two or more of the entities described above.

Recipient (49 C.F.R. § 21.23(f)): any state, territory, possession, the District of Columbia, or Puerto Rico, or any political subdivision thereof, or instrumentality thereof, any public or private agency, institution, or organization, or other entity, or any individual, in any State, territory, possession, the District of Columbia, or Puerto Rico, to whom Federal financial assistance is extended, directly or through another recipient, including any successor, assignee, or transferee thereof, but such term does not include any ultimate beneficiary.

Statewide transportation improvement program (STIP): A statewide prioritized listing/program of transportation projects covering a period of four years that is consistent with the long-range statewide transportation plan, metropolitan transportation plans, and Transportation Improvement Program, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.”

Sub-recipient: A recipient entity that receives federal funding from a Primary recipient.

Title VI Program: The system of requirements developed to implement Title VI of the Civil Rights Act of 1964. References in this part to Title VI requirements and regulations shall not be limited to only Title VI of the Civil Rights Act of 1964. Where appropriate, this term also refers to the civil rights provisions of other Federal statutes to the extent that they prohibit discrimination on the grounds of race, color, or national origin in programs receiving federal financial assistance of the type subject to Title VI itself. These Federal statutes are:

- (1) Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d-d4 (49 CFR, Part 21; the standard DOT Title VI assurances signed by each State pursuant to DOT Order 1050.2; Executive Order 11764; 28 CFR 50.3);
- (2) Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601-4655) (49 CFR Part 25; Pub. L. 91-646);
- (3) Title VIII of the Civil Rights Act of 1968, amended 1974 (42 U.S.C. 3601-3619);
- (4) 23 U.S.C. 109(h);
- (5) 23 U.S.C. 324;
- (6) Subsequent Federal-Aid Highway Acts and related statutes.

II. Title VI Standard Assurances & Policy Statements

Standard DOT Assurances

23 CFR 200.9(a)(1) requires assurances from INDOT 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 otherwise be subjected to discrimination under any program or activity for which the recipient receives federal assistance from the DOT, including the FHWA.

The U.S. Department of Transportation (U.S. DOT) conditions the award of federal financial assistance to the recipient assuring that its programs and activities will be conducted in compliance with Title VI of the Civil Rights Act of 1964, which forbids discrimination on the basis of race, color, or national origin. This requirement is located at 49 C.F.R. § 21.7(a). To support the implementation of this requirement, the U.S. DOT provides an assurances agreement in U.S. DOT Order 1050.2A that federal fund recipients and subrecipients must sign in order to receive federal financial assistance. INDOT's Commissioner signs the Federal Highway Administration (FHWA) Assurances. The Title VI assurances are submitted to the FHWA annually or when INDOT appoints a new executive director during the federal fiscal year.

In accordance with USDOT Order 1050.2A, a copy of INDOT's Title VI Nondiscrimination Assurances signed by INDOT's Director Michael J. Smith are attached as [Attachment A](#).

Title VI Nondiscrimination Policy Statement

INDOT implements compliance with Title VI 49 CFR § 21, 23 CFR Part 200 and as policy, assures nondiscrimination compliance on the grounds of race, color, and national origin as provided by Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, Executive Order 13166 (Limited English Proficiency). INDOT's policy is to ensure no person is excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation (DOT) on the grounds of race, color, or national origin.

It is INDOT's Policy to value individual civil rights and to provide equal opportunity and equitable service for the citizens of this state. As a recipient of federal funds, INDOT adheres to Title VI of the Civil Rights Act of 1964 and all related statutes, regulations, and directives.

INDOT strives to achieve nondiscrimination in its programs, services, or activities, directly or indirectly regardless of whether those programs, services, and/or activities are federally funded.

Whenever INDOT distributes federal-aid funds to a second-tier subrecipient, such as a local public governmental entity, INDOT will include Title VI language in all written agreements with that entity.

The following individual has been identified as INDOT's Title VI Program Manager (Program Manager) and is delegated the authority necessary to maintain responsibility for initiating and monitoring Title VI activities, preparing reports, and performing other responsibilities, as required by 23 C.F.R. § 200 and 49C.F.R. § 21.

Taffanee L. Keys
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*INDOT's nondiscrimination statement is signed by INDOT's Executive Director, **Michael Smith**, and is included herein as [Attachment B](#).*

The INDOT Civil Rights Counsel/Title VI Manager has direct access to INDOT's Commissioner. This position works closely with INDOT's Program Areas to implement Title VI nondiscrimination program responsibilities to discern and limit the adverse effects of its programs and activities on the health, safety, or economics of Title VI protected classes and LEP populations. Each program area takes full responsibility for the prevention of discrimination and ensuring nondiscrimination compliance in all INDOT programs and activities.

INDOT's Commissioner, Michael J. Smith signs assurances and delegates full authority to the Civil Rights Counsel /Title VI Nondiscrimination Program Manager to oversee and implement Title VI and all related regulations.

III. Authorities

Discrimination under Title VI

It is the responsibility of every INDOT employee to prevent, minimize, and eradicate any form of

discrimination. There are two types of discrimination prohibited under Title VI and its related statutes: (1) disparate treatment, which alleges similarly situated persons are treated differently because of their race, color, or national origin (i.e., intentional discrimination); and (2) disparate impact/effects, when a facially neutral policy, procedure, or practice results in different or inferior services or benefits to members of a protected group. The focus of disparate impact is on the consequences of a decision, policy, or practice rather than the intent.

INDOT's efforts to prevent such discrimination must address, but not be limited to, how a program or activity:

1. Impacts the public;
2. Provides accessibility;
3. Provides equal access to benefits;
4. Encourages participation;
5. Provides services equitably;
6. Initiates contracting and training opportunities;
7. **Investigate** complaints;
8. Allocates funding; and
9. Prioritizes projects.

Authorities

The authorities applicable to INDOT's Title VI/Nondiscrimination Program include:

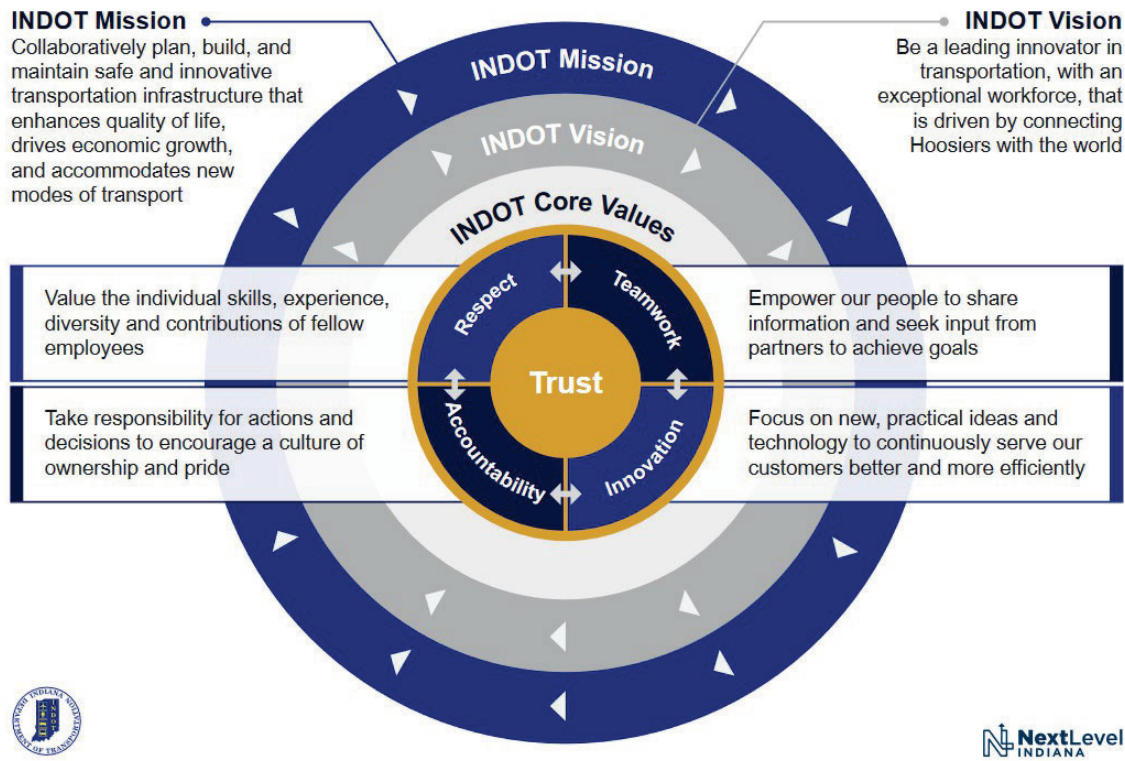
1. **Title VI of the Civil Rights Act of 1964** (42 U.S.C. §2000d et seq., 78 stat. 252), (Prohibits discrimination on the basis of race, color, and national origin.)
2. **49 CFR Part 21** (entitled Nondiscrimination in Federally Assisted Programs of the Department of Transportation-Effectuation of Title VI of The Civil Rights Act of 1964);
3. **23 CFR Part 200** (FHWA's Title VI/Nondiscrimination Regulation); 5
4. **28 CFR Part 50.3** (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The following executive orders place further emphasis on preventing discrimination based on race and national origin:

1. **Executive Order 12898**, 3 CFR 859 (1995), entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations."
2. **Executive Order 13166**, 3 CFR 289 (2001), entitled "Improving Access to Services for Persons with Limited English Proficiency."
3. **Executive Order 13985**, Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.
4. **Executive Order 14096**, Revitalizing our Nation's Commitment to Environmental Justice for All - see EO 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

IV. Mission, Vision, and Values; Policy Overview and Objectives

Our Mission, Vision, and Core Values



INDOT’s Mission, Vision, and Values are the drivers of our Title VI efforts and sets the standards for our employees, partners, and stakeholders to provide the highest quality to those we serve. All INDOT employees, partners and stakeholders have the responsibility to prevent, minimize, and eradicate all forms of discrimination. Specifically, there are two types of illegal discrimination prohibited under Title VI and its related statutes:

- (1) disparate treatment that alleges similarly situated persons are treated differently because of their race, color, or national origin (i.e., intentional discrimination.)
- (2) disparate impact/effects when a facially neutral policy, procedure, or practice results in different or inferior services or benefits to members of a protected group. In disparate impact, the focus is on the consequences of a decision, policy, or practice rather than the

intent.

INDOT's Title VI Nondiscrimination Program Objectives:

1. Be transparent with the public on INDOT's standard operating procedures to ensure nondiscrimination in all INDOT programs and activities.
2. Assign and clarify roles, responsibilities, and procedures for ensuring compliance with Title VI and all related nondiscrimination statutes.
3. Assure that all participants and beneficiaries affected by INDOT's programs, projects, and activities receive the services, benefits, and opportunities to which they are entitled without regard to race, color, national origin, creed, age, sex, disability, income status, or limited English proficiency.
4. Bring awareness to all INDOT employees, including consultants and contractors performing work on behalf of INDOT of their roles and responsibilities to ensure nondiscrimination in all INDOT programs, services, and activities, regardless of funding source.
5. Establish procedures for identifying and eliminating discrimination when found to exist.
6. Establish INDOT processes for conducting Title VI internal program area reviews and external subrecipients reviews to determine the effectiveness of the area's compliance activities at all levels.
7. Establish INDOT compliance and enforcement procedures to address deficiencies or when noncompliance is determined for internal program areas and subrecipients.
8. Describe the procedures for processing complaints by persons who believe that they have been subjected to discrimination under Title VI in any INDOT service, program, or activity, including programs administered by INDOT subrecipients.

V. Organization and Staffing of the Prequalification – Civil Rights Division

INDOT's Title VI/Nondiscrimination Program has been established in accordance with federal rules under 23 CFR Part 200 and falls within the scope and responsibilities of INDOT's Legal Department's Prequalification Division.

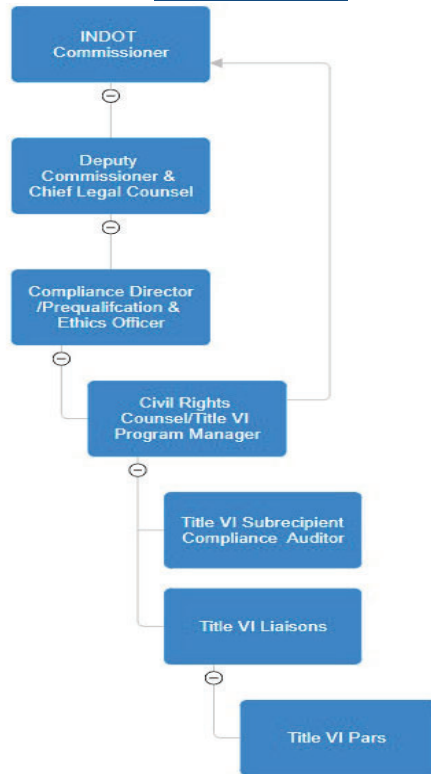
Organization

Per 23 CFR 200.9(b)(1), INDOT appointed the Civil Rights Counsel, Title VI Manager

(hereinafter referred to as the Title VI Manager) to oversee and implement Title VI and all related regulations in all INDOT programs and activities. The Title VI Manager is responsible for all operational aspects of INDOT’s Title VI/Nondiscrimination Program and has been delegated sufficient authority and responsibility to effectively carry out the duties assigned to this position.

The Title VI Manager reports to the Compliance Director and Ethics officer. The Compliance Director and Ethics Officer reports to the Deputy Commissioner and Chief Legal Counsel who reports directly to INDOT’s Commissioner. (See Organization Chart snapshot below which identifies the Civil Rights Counsel/Title VI Manager’s placement in INDOT). The Civil Rights Counsel/Title VI Manager has direct access to the Commissioner if needed. INDOT’s Commissioner has issued and signed a Policy Statement which assures that the Title VI Program Manager will have sufficient authority to carry out the duties assigned to this position effectively. A copy of this notice is included in [Attachment B](#) of this plan. [Click to view links to INDOT’s operational divisions.](#) INDOT’s

the organization chart is attached as [Attachment C](#).



Commissioner

INDOT’s Commissioner is appointed by the Governor of the State of Indiana pursuant to Indiana Code § 8-23-2-2. The Commissioner is responsible for supervising and

administering the overall activities of INDOT, its districts, divisions, and employees. As such, the Commissioner signs all necessary nondiscrimination assurances to aid in ensuring all civil rights requirements are met. Additionally, the Commissioner delegates duties and powers to efficiently aid in the operation of INDOT.

Michael J. Smith
Commissioner
Indiana Department of Transportation
100 N. Senate Avenue, Room N758
Indianapolis, IN 46204

Deputy Commissioner and Chief Legal Counsel

The Deputy Commissioner and Chief Legal Counsel manage Contract Administration, Prequalification and Compliance, Internal Affairs, Litigation, Legal Services, Digital Transformation, IT, and Data Governance Divisions of INDOT. As Deputy Commissioner & Chief Legal Counsel for INDOT, the Deputy Commissioner’s responsibilities include but are not limited to, providing legal advice and assistance to the divisions and districts within the agency, investigating the legality of agency actions and validity of public complaints, drafting proposed legislation and administrative rules, researching, and interpreting the law, and preparing legal opinions.

Kate Shelby, J.D.
Deputy Commissioner & Chief Legal Counsel
Indiana Department of Transportation
100 N. Senate Avenue, Room
N758 Indianapolis, IN 46204

Compliance Director and Ethics Officer

The Compliance Director and Ethics Officer is responsible for implementing and administering a quality-based prequalification process to ensure all road construction projects are awarded to the most qualified contractors in a nondiscriminatory manner.

Michele Steele, J.D., LLM
Indiana Department of Transportation
100 N. Senate Avenue, Room N758
Indianapolis, IN 46204

Civil Rights Counsel

INDOT’s Civil Rights Counsel is INDOT’s Title VI Program Manager. The Title VI Program Manager is responsible for the oversight and coordination of INDOT’s compliance with Title VI and all related statutes, regulations, and directives. The Title VI Program Manager

reports to the Compliance Director & Ethics Officer but also has direct and independent access to INDOT's Chief Counsel and INDOT's Commissioner as warranted to ensure INDOT's Compliance with nondiscrimination requirements.

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A. Staffing

Title VI Program Manager

General responsibilities of the Program Manager include, but are not limited to:

1. Develop procedures and processes to prevent discrimination in INDOT's policies, procedures, programs, and activities.
2. Coordinate Title VI Program development and implementation with internal program areas.
3. Review INDOT's program manuals, contracts, and policy documents to determine whether Title VI is appropriately addressed and implemented agency-wide.
4. Provide legal and technical assistance and advice on Title VI matters to program area Subject Matter Experts and program area managers.
5. Work with program areas to collect and document statistical data.
6. Provide Title VI training for INDOT internal staff and Subrecipients.
7. Complete INDOT's Title VI Implementation Plan for submission to FHWA by October 1 each year.
8. Complete INDOT's Title VI Annual Accomplishment Report for submission annually to FHWA by November 1.
9. Complaint investigation and resolution regarding complaints referred by FHWA HCR.
10. Distribute, and where necessary, ensure translation of Title VI documents for the public.
11. Develop and implement INDOT's Limited English Proficiency (LEP) Plan.
12. Conduct Title VI reviews of internal program areas, MPOs, LPAs Consultant Contractors, and all subrecipients of federal funding to ensure Title VI compliance.

B. Interdisciplinary Approach

INDOT believes in a collaborative approach to ensure non-discrimination in all its programs, services, and activities. A collaborative relationship be maintained between the Title VI Manager and INDOT's divisions and districts. INDOT has established an interdisciplinary team that provides organizational knowledge of its respective area

disciplines and standard operating policies, while the Title VI Manager provides a practical application of Title VI non-discrimination regulations and practicalities.

The Title VI Manager works with district and division team members and fosters regular communication with team members to provide technical assistance, conduct reviews, and develop action plans, training courses, and language assistance tools.

INDOT's Title VI Interdisciplinary Team is comprised of Program Area (District Offices) Liaisons and Program Area Representatives (PARS) who are subject matter experts. The Interdisciplinary Team meets quarterly to discuss the program area issues to ensure consistency of policies and non-discrimination across the agency.

Title VI Program Area Representation

INDOT's Program Area Representation is composed of core members from INDOT's program areas including a program area (or District Office) liaison and as many Program Area Representatives (PARS) as necessary to effectively meet Title VI plan, goals, and requirements. INDOT's Program Area Representation has a four-part mission:

1. To use an interdisciplinary and cross-division workflow approach to ensure compliance with Title VI and related nondiscrimination laws in the implementation of INDOT's programs and activities.
2. To remove programmatic and architectural barriers from INDOT's programs and activities per the relevant nondiscrimination laws.
3. To ensure meaningful access to INDOT's services and programs to all individuals regardless of race, color, or national origin.
4. To develop, fully integrate, and effectively maintain INDOT's Title VI Implementation Plans.

Each year INDOT will evaluate whether additional program areas should be included in the Title VI Implementation Plan and, if so, who will serve as a liaison and PAR(s). INDOT may also eliminate program areas from representation and/or reduce or expand the number of representatives and areas represented to best accomplish agency goals.

District and Program Area Title VI Liaison Responsibilities

The responsibilities of the district and Program Area liaisons include fostering awareness of INDOT's Title VI program and its requirements in the following respects:

1. Ensures each employee in their program area or district receives Title VI training yearly.
2. Develop and maintain district and division procedures for the collection and analysis of reported statistical data (race, color, or national origin) of participants in, and beneficiaries of INDOT programs within the program area or

district,

3. Identifies eligible Limited English Proficient (LEP) populations and disseminates agency information, where appropriate, in languages other than English.
4. Works with PARs to accomplish annual division program areas and/or district Title VI tasks.
5. Participates in an annual agency-wide Title VI Liaison meeting as required and schedules quarterly program area or District Title VI meetings (independently or as part of another area meeting) to establish and accomplish annual Title VI goals.
6. Coordinates with the Title VI Program Manager to complete an annual program area or district discrimination risk assessment that identifies and prioritizes risk areas and formulates mitigation strategies to be included in the annual Title VI Goals and Accomplishments Report no later than August 30th annually.
7. Provide technical assistance, guidance, and advice to staff, the districts' cities, counties, consultants, contractors, planning agencies, and other recipients of federal-aid highway funds.
8. Refers to Title VI allegations and complaints to the Title VI Manager for further Investigation.

**See INDOT's list of Title VI Liaisons [Attachment D](#)*

Title VI Program Area Representative

The responsibilities of the Title VI PARs are outlined below:

1. Promotes awareness of nondiscrimination requirements throughout the day-to-day operation of the program area.
2. Assists the Title VI Liaison in ensuring all employees in the program area have received Title VI training within the past two years.
3. Attends quarterly or other regularly scheduled program area nondiscrimination meetings as deemed necessary by the liaison.
4. Participate in the identification of Title VI impacts and mitigation measures of proposed projects.
5. Assist in obtaining public input, particularly in minority and traditionally underserved areas.
6. Maintain statistical data by race, color, and national origin, as needed for respective program areas.

**See INDOT 's list of Title VI Pars [Attachment D](#)*

VI. Program Area Internal Review Procedures

Internal Program Review

INDOT conducts Title VI reviews of its programs, projects, activities, and services. INDOT

conducts reviews of its programs to mitigate the risk of potential disparate impacts upon affected populations. The review process provides an opportunity to identify deficiencies and corrective actions to bring programs and services into compliance with the terms of Title VI and all related statutes. On an annual basis, the Title VI/Nondiscrimination Accomplishments and Goals report will be reviewed to ensure it contains the necessary information to evaluate the INDOT Title VI/Nondiscrimination program as it pertains to its accomplishments, shortfalls, and problem areas.

The internal Title VI review is designed to reach, at a minimum, the public-facing program areas on a three-year cycle. This means that each program area will undergo an assessment for compliance with Title VI obligations at least once every three years. Internal Title VI reviews are performed in the form of a Title VI questionnaire. (See [Attachment E](#)) Each INDOT program area and appointed Interdisciplinary Team member from the respective area are notified of the review by the Title VI Manager. The internal review request includes a questionnaire that is tailored with general and program-specific questions that focus on gathering information about the implementation of Title VI/Nondiscrimination requirements.

Desk audits will also be conducted. The Title VI Manager will request and review documents, as well as standard operating procedures from the program areas to determine the extent to which Title VI requirements and activities are incorporated into standard operating procedures, services, and activities of the program area. This review looks for the presence of standard Title VI assurance language, as needed, and compliance with federal Title VI-related rules and regulations.

During the desk audit, the program area reviewer may conduct in-person interviews with program area staff, both managerial and frontline, to determine the extent of personnel knowledge of Title VI as well as compliance with Title VI obligations. The program area review is inclusive but not limited to the following:

1. Procedures to ensure non-discrimination in methods of administration, i.e., criteria for selection of and order of projects.
2. Procedure for reviewing directives for compliance with Title VI requirements.
3. Procedures for eliminating or remediating discrimination
4. Procedures for resolving Title VI deficiencies
5. Training measures for employees
6. Title VI assurances
7. Language assistance to LEPs
8. Public notifications & Involvement
9. Title VI complaints

Once the questionnaire and desk audit are completed, the data will be reviewed. A “Determination of Findings” will be issued within a 30-day period following receipt of documentation, desk audits, and interviews. A copy of the findings will be provided to the division head of the program being reviewed. No action on the part of the program will be required on findings of compliance unless a condition of compliance is specified.

Corrective Action

Effective compliance with Federal regulations requires the INDOT to take corrective action to resolve Title VI/Nondiscrimination deficiencies. Programs found not in compliance will result in the development of a Title VI Work Plan (T6WP) to overcome any deficiencies noted in the Determination of Finding within a period not to exceed 90 days. INDOT’s Internal affairs will also receive the notice of the division’s need to develop a T6WP and, if necessary, will aid the division in the development and execution of its T6WP. If it is determined that the matter cannot be resolved voluntarily, by informal means, action will be taken to effectuate compliance, up to and including notice to the Commissioner.

The Title VI Manager will also provide technical assistance and guidance as needed to aid the program area. Efforts to resolve deficiencies found at the outset of the review will be pursued throughout the compliance review process.

Self-Monitoring

Self-monitoring requires program areas to track, regulate, and observe their processes to ensure compliance with Title VI/Nondiscrimination. Documentation is a critical element of the compliance monitoring process. It is relied upon to provide evidence, proof, and support of historical facts during monitoring and compliance review activities. Policy decisions, procedures, analyses, actions, and outcomes should be documented as part of the program area staff’s daily routine.

Program Areas

1. CAPITAL PROGRAM MANAGEMENT

The Capital Program Management within INDOT develops projects following state and federal regulations to meet transportation asset management targets and to improve safety, mobility, and economic development for the state of Indiana. Capital Program Management is responsible for projects from when they are initially scoped, and a need is identified through to construction.

A. SYSTEMS PERFORMANCE & TRANSPORTATION POLICY MAJOR PROJECTS

i. STIP Administration Planning Division

The STIP identifies the funding and the scheduling of transportation projects and programs. It includes all state and local transportation projects funded with federal highway and/or federal transit funding along with 100 percent state-funded transportation projects. The Planning division is housed in INDOT's Capital Program Management Department. It is responsible for the development of and maintenance of an integrated, comprehensive, planning and programming process for safe, efficient, cost-effective, and high-quality transportation services. It also conducts transportation studies and administers transportation planning programs statewide. It ensures that multi-modal planning is executed in accordance with Title VI. This process requires the consideration of the social, economic, and environmental effects of a proposed plan or program to avoid biased or discriminatory programs.

Activities to ensure nondiscrimination in the Planning Program Division:

1. Monitor the utilization of demographic information that identifies populations and evaluate the equitable distribution of the benefits/burdens of the transportation plans and activities, as well as transportation system investments, on these populations.
2. Review the process in which projects are selected to ensure that project selection does not subject any populations to disparate, adverse effects based on race, color, or national origin.
3. Compliance regarding nondiscrimination in the public involvement process, including the analysis and removal of potential barriers to participation.
4. Ensure language assistance is available to LEPs as part of public outreach and community involvement activities.
5. Employ methods to ensure that issues/concerns raised by minority populations, low-income populations, the elderly, persons with disabilities, all interested persons, and affected Title VI populations are considered in the decision-making process.
6. Ensure economic, social, topographic, and environmental impacts are considered for planned project locations.
7. The assessment of transportation needs through the outcomes of studies on travel habits, physical environments, and neighborhoods of various demographic groups.
8. Ensure transportation planning designs and facilities are accessible to disabled populations.
9. Provide Title VI training to division employees.
10. Promptly referring Title VI complaints to the Title VI Manager for referral to FHWA.

ii. Technical Plan & Programs Division

The Technical Plan & Programs Division is also housed in Capital Program Management. This Division is responsible for the development of INDOT's Long-Range Transportation

Plan (LRTP). The division assists in the preparation and implementation of public involvement plans and programs aimed at improving attendance and participation of all population groups. The Division also monitors the transportation planning activities of the various Metropolitan Planning Organizations (MPOs).

Activities to ensure nondiscrimination in the Technical Plan & Programs Division:

1. Implement methods to collect demographic information to be used by Operating Bureaus to determine transportation benefits for both the Long-Range Transportation Plan (LRTP) and the Statewide Transportation Improvement Program Plan (STIP).
2. Take measures to ensure that reasonable accommodations for persons with disabilities are provided and meaningful access for LEP persons is provided during the STIP process.
3. Provide opportunities to minority, low-income, disabled, and elderly groups to provide input on transportation projects and priorities as part of the continuing transportation planning process for the development of the STIP.
4. Take measures to ensure that all population groups are adequately informed to participate in the development of the STIP process.
5. Provide Title VI training to division employees.
6. Promptly referring Title VI complaints to the Title VI Manager.
7. Ensure nondiscrimination in efforts to solicit public involvement.
8. Ensure all public hearings are accessible to persons with disabilities and LEP.
9. Notify and make accessible to affected protected group residents, public meetings, or hearings regarding a proposed project.

B. PROJECT DELIVERY

i. Major Project Delivery

Project Delivery ensures that major project and district projects are designed and delivered and performed according to federal and state design requirements. This division ensures that coordination efforts are made by all stakeholders within the project for all stages of a major or district project.

Activities to ensure nondiscrimination in the Project Delivery Division:

1. Ensure all aspects of the planning and programming delivery process operations comply with Title VI, by identifying and analyzing appropriate data, state-wide and project specific to address issues of equity and non-discrimination.
2. Review the magnitude of the project's activity, and any discriminatory impact on Title VI protected classes for project development activities.
3. Ensure all proposed contracts are advertised in minority publications.
4. Ensure consultants' compliance with State and Federal requirement guidelines.

5. Use federal requirements for procurement to ensure merit-based selection.
6. Set rules regarding DBE utilization across procurement methods.
7. Review awards for fairness and equity in the provision of contract opportunities.
8. Advertise the availability of contract opportunities on INDOT's website to assure full and fair notification to any interested vendor.
9. Include Title VI language in contracts and Requests for Proposals (RFP).
10. Maintain a record of any complaints received regarding the application of construction rules and regulations to ensure that they are being applied equitably.

ii. **Environmental Services Division**

The Environmental Services Division is the division responsible for conducting EJ analysis as part of the NEPA process. The program area for this team has been combined with representatives from the planning and scoping areas to promote cross-division communications regarding EJ and other Title VI issues.

The Environmental Division oversees all environmental programs within INDOT. This division ensures that local, state, and federal environmental laws are complied with during the development, construction, and operation of INDOT projects.

The Environmental Services Division utilizes a scientific approach to providing education, training, technical expertise, and policy development to achieve a safe, efficient, and environmentally compliant plan for Indiana's transportation system. Environmental Services is responsible for carrying out activities related to Environmental Justice and providing guidance on addressing the needs and potential impacts of transportation projects on traditionally underserved populations to ensure greater transportation equity.

Activities to ensure nondiscrimination in the Environmental Services Division:

1. Conduct studies of the potential project sites for effects on such issues as cultural resources, community life, and land use patterns.
2. Monitor compliance with Title VI requirements in all aspects of the environmental process.
3. Prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data.
4. Use site visits, census data, and local contacts (local officials, etc.) to profile the community where a federally funded project is planned, so that Limited English Proficient (LEP) persons are identified and accommodated.
5. Disseminate to the public their rights to call or write the department to view plans and discuss environmental problems.

6. Provide Title VI Manager a copy of all environmental assessments and studies before public release for information for review and comments.
7. Provide Title VI training to division employees.
8. Refer Title VI complaints to the Title VI Manager.

iii. **Real Estate & Right-of-Way**

INDOT's right-of-way plan provides information to define the extent of the right-of-way required to construct and maintain a highway. Right-of-way plans provide the information needed to facilitate an accurate appraisal of the proposed undertaking and serve to expedite the required negotiations leading to the acquisition of the rights required for the highway facility.

INDOT's acquisition program is nondiscriminatory and is conducted without regard to race, color, and national origin. The right-of-way acquisition process entails appraisal of property, negotiation of terms and conditions for acquisition, and assistance in the relocation of displaced individuals, businesses, farm operations, and nonprofit organizations, as well as property management.

The Division ensures the equitable treatment of businesses and persons displaced by highway projects, regardless of race, color, or natural origin by operating under the Federal Code of Regulations (49 CFR Part 24) to address the requirements established by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended.

Activities to ensure nondiscrimination in the Real Estate & Right of Way Division:

1. Provide translators in instances where affected landowners have LEP.
2. Establish notification and advertising procedures to ensure that efforts are made to notify minority populations, and that appropriate Title VI language is used in all letters and public notices.
3. Ensure that hearing formats are designed to encourage participation by and comments from underrepresented persons and communities.
4. Ensure that appraisal and negotiation operations do not have a disparate impact on minority, race, color, national origin, and LEP populations
5. Provide replacement housing listings to impacted persons without regard to race, color, national origin, disability, or limited English proficiency.
6. Apprise affected property owners, tenants, and others involved of their rights and options regarding negotiations, relocation, condemnation, and other aspects of the acquisition process.
7. Incorporate Title VI language and assurance statements in all surveys of property owners & tenants.
8. Maintain data on Title VI demographics of individuals and communities impacted by the

- ROW process, where possible.
9. Provide Title VI training to division employees.
 10. Promptly refer Title VI complaints to the Title VI Manager to refer to FHWA.

4. CONSTRUCTION & MATERIALS MGMT

The Construction and Materials Management Department's role within INDOT is to build and maintain a safe and efficient transportation system through the application of current materials engineering and testing procedures. The Division procures and administers consultant contracts as well as performs testing and inspection of highway construction and maintenance materials. This department provides technical and administrative support to INDOT and highway construction industries by assisting in the resolution of construction and materials issues. This includes consulting with district construction engineers, district materials engineers, project engineers, and other Central Office staff regarding specifications, methods, techniques, and policies of highway construction and materials, inspection, and contract administration.

i. Construction Management & Distribution Supply Division

INDOT's Construction Management Division is responsible for all construction activity on U.S. routes, state roads, and interstates in the State of Indiana. This includes but is not limited to, grading, sloping, placing culverts, paving or construction of new roadway, bridge maintenance, and interchange modifications.

The Construction Management Division works with the district construction offices and the Title VI Program Manager, as well as EEO (Economic Opportunity Officers) when necessary to resolve problems on construction contracts. The Construction Management Division provides oversight of the statewide construction programs by setting policies and maintaining the technical manuals used by consultants.

This Division has the responsibility for assuring that highway construction practices adhere to Title VI requirements. INDOT Construction Division ensures that any company working on construction projects can do so in a nondiscriminatory manner.

Activities to ensure nondiscrimination in the Construction Mgmt. & District Supp Division:

1. Ensure nondiscrimination in the approval of materials suppliers and sources.
2. Review all proposal documents for required nondiscrimination provisions are included in the proposal are the nondiscrimination provisions listed in Title VI assurances.
3. Ensure project information is adequately distributed to stakeholders and the public, following INDOT's public involvement procedures and LEP plan.

4. Ensure that all mitigation measures during construction are effectively implemented to reduce health and environmental hazards to the public, e.g., work zone safety, measures to reduce noise and air impacts, and erosion control measures.
5. Carefully review project activities to avoid disproportionately high or adverse impacts on underserved communities during the construction phases.
6. Promptly refer Title VI complaints to the Title VI Manager.

ii. Research & Development

The Research & Development Division provides decision-makers with the information and tools they require to ensure Indiana's transportation system meets the evolving needs of residents and the traveling public. The program works to anticipate and address transportation concerns before they become critical problems. Projects for research are prioritized based on the INDOT's needs and availability of funding. INDOT partners with Purdue University and other surrounding State of Indiana Universities to conduct research projects. The Division program personnel monitors research projects to ensure they are not conducted in a discriminatory manner.

Activities to ensure nondiscrimination in the Research & Development Division:

1. Review the division's internal operational procedures, guidelines, directives, and policies to ensure compliance with Title VI requirements.
2. Identify and inform minority technical or research associations to ensure they receive all proposal or problem statement solicitations and instructions on how to develop and tailor the services they offer to participate in INDOT projects.
3. Verify the use of a nondiscriminatory process for the selection of grant recipients.
4. Assist the Title VI management in gathering and organizing the reporting data for the Research Division portion of the Annual Title VI Goals & Accomplishments Report.

5. LEGAL

The INDOT Legal is charged with the responsibility of serving as legal counsel for INDOT. Specific responsibilities include but are not limited to providing legal advice and assistance to the divisions and districts within the agency; investigating the legality of agency actions and validity of public complaints; drafting proposed legislation and administrative rules; researching and interpreting the law; preparing legal opinions; attending and testifying at legislative committee hearings; directing and monitoring INDOT litigation and appeals; analyzing litigation claims against and in favor of INDOT; and performing related duties. Legal is divided into several service areas: Civil Rights ADA/Title VI, Bus Analytic & Visual, Contract Administration, Digital Transformation, Ethics, Internal Affairs, Information Technology, Legal Services, Litigation Team, Policy &

Compliance, and Prequalification.

a. *PREQUALIFICATION & COMPLIANCE DIVISION*

Prequalification

The Civil Rights Counsel/Title VI Program Manager is housed within the Prequalification Division. The Prequalification Division conducts the consultant and contractor prequalification process. Before bidding or subcontracting on any INDOT projects, firms must be prequalified which is inclusive of understanding and adhering to all Title VI laws, rules, and regulations.

The Prequalification Division Compliance Team maintains information related to Title VI compliance. Each application for prequalification requires certification with Title VI nondiscrimination policies, training, compliance, forms, and other program requirements. Additionally, the Prequalification Division Compliance Team conducts audits of businesses. The Team provides technical assistance giving priority to the contractors who may be at the lowest level of compliance related to Title VI and making efforts to bring these contractors into compliance.

The Prequalification Division also conducts LPA compliance reviews of Indiana communities that request and/or are likely to become subrecipients of federal funds to ensure LPAs comply with Title VI requirements. The Compliance Teams review LPAs Title VI Implementation Plans and ADA Transition Plans, nondiscrimination assurances, compliant policies and procedures, and LEP compliance.

Activities to ensure nondiscrimination in the Prequalification Division Program Area:

1. Review a sampling of construction contracts, subcontracts, purchase orders, and lease agreements to ensure the inclusion of required nondiscrimination provisions.
2. Collect and forward data supporting possible trends of discrimination.
3. Ensure adequacy and consistency of the process; provide documentation illustrating nondiscrimination in the approval of material suppliers and sources.
4. Examine uniformity in the assessment of sanctions, liquidated damages, withholding payments, suspension, termination of contracts, and decertification.
5. Review LPAs submitted Title VI Implementation Plans for compliance per FHWA compliance checklist and review LPAs assurances.
6. Review LPA's compliance with LEP requirements and standards.
7. All the responsibilities of the Title VI Program Manager as detailed herein.

b. CONTRACT ADMINISTRATION DIVISION

Contract Administration’s purpose is to develop and execute contracts with our vendors (consultants and contractors). Our mission is to adhere to Indiana law to drive these agreements with the highest quality consultants and lowest cost contractors to design and build our next-level roads in the most effective manner.

i. Construction Contracts

The division assists INDOT by:

1. Publishing and distributing a manual about consultant and contractor contract development.
2. Providing training on an annual basis about construction contract development.
3. Assisting personnel, or pre-contracts to facilitate the contracting process.
4. Reviewing contracts for approval.

ii. Professional Services Contracts

The division assists INDOT by:

2. Publishing and distributing a manual about consultant contract development.
3. Providing training on an annual basis about professional services contract development.
4. Assisting personnel, or pre-contracts to facilitate the contracting process.
5. Negotiate and develop contracts for approval.

Activities to ensure nondiscrimination in the Contract Administration Division

1. Ensure that clauses of Appendix A and Appendix E of U.S. DOT Order No. 1050.2A, Standard Title VI/Nondiscrimination Assurances are programmed to automatically build into the standard provisions for design engineering contracts.
2. Ensure that clauses of Appendix A and Appendix E of U.S. DOT Order No. 1050.2A, Standard Title VI/Nondiscrimination Assurances are programmed to automatically build into the general provisions for construction engineering contracts.
3. Ensure inclusion of required nondiscrimination provisions as well as nondiscrimination in the selection of consulting firms.
4. Ensure professional service agreements contain appropriate nondiscrimination language.
5. Ensure Title VI compliance is integrated into the Contract Division’s internal procedures and is reviewed and updated as necessary to maintain compliance.
6. Promptly refer Title VI complaints to the Title VI Program Manager to refer to FHWA.

6. OPERATIONS

The Deputy Commissioner of Operations manages INDOT’s Six District Offices. The six

districts organize and manage highway construction, maintenance, traffic, development, and testing within their respective districts. INDOT has 31 subdistricts and 119 units to cover the maintenance of all the highways under its authority within the state borders.

Operations managers oversee the subdistricts with department managers, supervisors, and employees to carry out the district's mission. The six districts are Crawfordsville, Fort Wayne, Greenfield, LaPorte, Seymour, and Vincennes. Indiana has 92 counties which are divided amongst the six districts.

The district offices provide a local point of contact for programs, projects, and activities within their geographic location. Each district office conducts project-specific public engagement that is consistent with Title VI and Limited English Proficiency requirements for public outreach during the development of INDOT projects within their district. Each district office compiles the demographic data in the project area and details the required public outreach and recommendations for community resources to aid in information dissemination. The district offices coordinate necessary language access needs, including document translation and oral interpretation of presentations. The district offices also engage in inclusive public engagement and relationship-building with the public to earn trust and mutual understanding.

Activities to ensure nondiscrimination in District Offices

1. Compile demographic data on each project to ensure public outreach is targeted to the identified populations.
2. Through cooperation with the central office, identify race, color, and national origin populations and take steps to ensure policies, programs, and activities do not present discriminatory impacts or discriminatory treatment.
3. Ensure meaningful participation opportunities exist for LEP individuals and underserved communities.
4. Ensure that information is disseminated in alternative formats upon request consistent with the INDOT LEP Plan.
5. Monitor and review the right-of-way activities of cities and counties to verify compliance with Title VI in their right-of-way processes.

VII. External Review Program

General

In compliance with 23 CFR section 200.9(b)(7) and FHWA guidance, INDOT reviews and monitors subrecipients that receive FHWA funding through INDOT for compliance with Title VI requirements. Before receiving FHWA funding, subrecipients must sign an

Agreement with INDOT, including assurances of nondiscrimination in accordance with USDOT Order 1050.2A.

INDOT has policies and processes in place to monitor its subrecipients for compliance with Title VI Program requirements. These policies include processes for the review and audit of contractors and consultants, LPAs, MPOs, and university subrecipients. These policies are specific to each type of subrecipient and represent, in many cases, layers of oversight and/or levels of review.

Objective

The overall objective of compliance monitoring is to ensure all entities and agencies over which INDOT has Title VI oversight responsibility remain or are brought into compliance with Title VI and other nondiscrimination requirements. INDOT has historically used on-site compliance reviews as a tool to monitor Title VI Program compliance. Compliance reviews and audits are used to monitor recipient and subrecipient compliance and to proactively identify and remedy potential and actual violations of the nondiscrimination laws.

TYPES OF SUBRECIPIENT COMPLIANCE MONITORING AND REVIEWS

INDOT tailors its subrecipient monitoring practices to the type of subrecipient and level of review required.

1. Types of subrecipients over whom INDOT has oversight responsibility include:

- a. Contractors
- b. Consultants
- c. Local Public Agencies (LPAs)
- d. Metropolitan Planning Organizations (MPOs)
- e. Cities, Towns and Counties
- f. Universities & Colleges

2. Levels of subrecipient monitoring may include:

- a. Certifications of compliance
- b. Compliance Surveys
- c. Desk Reviews
- d. Telephone / Virtual Interviews
- e. On-site Reviews

POLICIES AND PROCEDURES FOR CONTRACTOR COMPLIANCE REVIEWS AND AUDITS

The Title VI Program Manager collects and reviews prequalification certifications from

contractors and consultants. These subrecipients may be selected to participate in compliance reviews at INDOT's discretion. The Program Manager will request that the subrecipient under review provide documentation before a scheduled telephone, virtual conference, or on-site visit. The subrecipient's responses will be reviewed and feedback will be provided during the conference or on-site visit. Using this method, the Title VI Program Manager can provide a same-day verbal preliminary determination of compliance to the subrecipient.

Compliance Review process

1. Written notice is provided to the contractor of the scheduled compliance review.
2. This notice is emailed at least thirty (30) days before the submission of information is due. The notice includes the due date and requires information and/or certifications requested. The contractor is also given notification of its obligation to cooperate, provide records, allow access to data, and make staff, subcontractors, and/or witnesses readily available.
3. Any person who fails to respond to a notice of compliance review, including the request for information, within the prescribed deadline shall receive written notification of his or her deficiency status. INDOT will send the Compliance Review Notice of Deficiency via email with a received status notification. The subrecipient then has five (5) calendar days from the date of receipt to respond in writing.
4. Information that is received from the contractor consultant is reviewed by INDOT. A notification is sent electronically regarding deficiencies. If necessary, a telephone call is scheduled to discuss the preliminary deficiencies observed and to request additional information as necessary. An on-site visit may be scheduled at INDOT's discretion.
5. When conducted, the on-site reviews may consist of three phases and are conducted by the Title VI Program Manager, and other trained and informed INDOT staff.
 1. The first phase may consist of a meeting with leadership and pertinent personnel. The reviewer may interview pertinent personnel and gather sufficient information to determine the subrecipient's compliance.
 2. The reviewer uses the on-site review form to solicit and record information gathered during the on-site interviews. The Contractor's contract with INDOT requires the contractor to monitor its subrecipients and to include the assurances in its subcontracts.
 3. During the second phase of the on-site compliance review, the reviewer may tour the project site and interview personnel and subrecipients if this is necessary due to

- the nature of the project or the deficiency.
4. In the third and final phase of the on-site review, the reviewer may conduct an exit interview with the pertinent personnel to report preliminary findings, conclusions, and recommendations.

 6. Preliminary Findings – Following the conclusion of the desk review and/or on-site review, the reviewer will provide the contractor with a written report of preliminary findings which may include the following.
 1. Documentation of any deficiencies observed; and
 2. Directives requiring the contractor to come into compliance within 30 days.

 7. Compliance Plan – Any deficiency that cannot possibly be resolved within 30 days shall be reflected in a compliance plan submitted to INDOT for approval within 30 days and shall include dates by which compliance will be achieved.

 8. Notice of Achievement - In addition, it is the contractor’s responsibility to notify INDOT that it has achieved its approved compliance plan goals. Failure to provide such notice may place the contractor or consultant in deficiency status. Examples of Title VI Deficiencies:
 1. The contractor’s Title VI Coordinator needs Title VI training;
 2. Contracts do not contain nondiscrimination assurance language;
 3. No method to provide services to LEP persons
 4. No Title VI complaint log;
 5. No Title VI complaint and hearing procedure.

 9. Failure to Comply – If the contractor does not voluntarily comply within 30 days of the original notification or by the agreed-upon extension of time, INDOT will issue a notice of noncompliance. If the contractor fails to submit appropriate and complete documentation to support its commitment to comply with Title VI, INDOT will issue a noncompliance letter and forward a copy to FHWA. Following the expiration of 30 days, INDOT will either:
 1. Certify the contractor’s compliance, or
 2. Issue a notice of noncompliance which may result in going before the Prequalification Committee, withholding payment, or suspending or terminating a contract.

Copies of all notices will be provided to FHWA.

POLICIES AND PROCEDURES FOR LPA SUBRECIPIENT MONITORING

Pre-Award Subrecipient Review: Title VI Assessment

The Civil Rights Counsel Title VI Manager is responsible for conducting Pre-Award assessments of LPAs to ensure LPAs will not use Federal financial assistance to discriminate on the basis of race, color, national origin, and Limited English proficiency. The LPA/MPO Grant Administration Division shares and disseminates federal financial assistance application guidelines that outline in detail the specific information that must be included in the federal financial assistance application process to meet the Title VI assessment requirements before the award of Federal Financial assistance.

The Pre-Award process is as follows:

A statement of compliance is submitted with the application that verifies that the LPA has a current Title VI Implementation Plan and has taken mitigation efforts to ensure nondiscrimination as well as identify their Title VI managers. See LPA Pre-Award Assurance Checklist, [Attachment F](#). If the LPA does not have a current Title VI Implementation Plan or has a Plan with deficiencies, the LPA must submit a voluntary compliance action plan (VCAP Letter) stating that they will cure all deficiencies within 120 days of the date of their submission. See [Attachment G](#).

Certification is verified with INDOT's record of the LPA prior submissions. If the applicant states it has submitted a current Title VI Plan when INDOT records indicate otherwise, the LPA then must submit verification and resubmit the plan.

Once compliance documents are received, the Civil Rights Counsel Title VI Manager will review the documents for compliance with Title VI and its related rules, regulations, and orders as well as FHWA Title VI requirements. The review will entail whether the LPA has taken mitigation measures and has documented measures to minimize or eliminate disparate impacts.

Post Award Subrecipient Compliance Review

INDOT requires subrecipients to include the following information in their Title VI plans, a nondiscrimination policy statement, standard DOT Title VI assurances, a designated Title VI Manager, a description of primary program areas, program review, compliance, and enforcement procedures, data collection and analysis, staff training procedures, complaint procedures (including routing Title VI complaints to FHWA), dissemination of Title VI information procedures, a statement of review of local directives, and a language assistance plan.

As part of INDOT's Title VI subrecipient review procedures, INDOT conducts reviews of subrecipient Title VI plans. During this process, INDOT coordinates with subrecipients and their Title VI Managers to collect Title VI plans and related documents. If subrecipient Title VI plans do not comply with FHWA requirements and guidance, INDOT provides

constructive comments and technical support. Once a subrecipient Title VI plan satisfies the requisite elements, INDOT will issue a concurrence letter. Title VI plans are then due yearly on or before October 1st.

The annual review may cover the following areas of inquiry:

1. Program administration
2. Number of federally funded projects awarded in the previous year
3. Copies of Title VI Policy, Assurances, Plan
4. Proof of public dissemination methods used for the Policy, Assurances, Plan
5. Title VI Complaint Procedure
6. How Complaint Procedures are disseminated to the public
7. Number and description of any Title VI complaints received in the previous year
8. Outcomes of any Title VI complaints received in the previous year
9. Title VI considerations in any manuals, SOPs, guidelines, policies, directives
10. Any Title VI training, (trainer and copy of presentations)
11. Records of attendance by name, date, position title
12. Planning activity
13. Public notice, (how provided, to whom, identify groups/individuals provided notice)
14. Explain how the determination of individuals/groups to be notified is made
15. Records of attendance (race, color, national origin, geographic location, language spoken)
16. Records of any questions, concerns, or complaints received during any open meeting

INDOT will identify subrecipients for review based on the following criteria:

1. INDOT knows of or has received formal or informal complaints regarding the subrecipient.
2. INDOT staff has identified subrecipients with known Title VI issues/concerns.
3. INDOT receives a request from FHWA to perform a review.
4. The subrecipient receives a large amount of funding from INDOT relative to other subrecipients.
5. The subrecipient is new to INDOT, receives a large amount of funding from INDOT, and requires Title VI training.

Review Steps

1. *Notice of compliance review*
 - a. When a compliance review commences, the Title VI program staff will send a notice of compliance review providing the reason for the review and a request for documents to the Subrecipient.
 - b. The Subrecipient will be given an initial thirty (30) days to produce the requested documentation. This period may be extended when a reasonable request for extension is made and at the discretion of the Title VI Manager.
 - c. Any Subrecipient who fails to respond to a notice of compliance review, including the request for information, within the prescribed deadline shall receive written notification of his or her deficiency status from the Title VI Manager. The subrecipient will be notified that failure to comply may result

in a suspension of federal funding.

2. Desk review

- a. Information received from the Subrecipient is reviewed in the office by the Title VI staff and a telephone call may be scheduled to discuss preliminary deficiencies observed and to request additional information as necessary.
- b. The following factors will play a role in determining whether an on-site review is necessary:
 - i. Deficiencies are directly related to improvements being constructed or maintained by the Subrecipient.
 - ii. Deficiencies include missing entire program components or are otherwise considered major deficiencies.
 - iii. The subrecipient's program Manager or representative has not been identified and/or does not appear to have the support of the executive leadership of the agency in ensuring program compliance; and,
 - iv. The review is based upon the receipt of a complaint.

3. Preliminary findings

- a. Following the conclusion of the desk review and/or on-site review, the Title VI Manager will provide the subrecipient with a written report of preliminary findings, which shall:
 - i. Document any deficiencies observed and direct the subrecipient to come into compliance within 120 days; and
 - ii. Require that any deficiencies, that cannot be resolved within 120 days, be reflected in a corrective action plan to be submitted to the Title VI Manager for approval within the 120-day period.
- b. The plan shall include dates for when compliance will be achieved, along with the specific action steps to be taken and who will be responsible for each task identified.

It is the subrecipient's responsibility to notify INDOT that it has achieved its approved corrective action plan goals. Failure to provide such notice will place them in deficiency status. If the subrecipient fails to submit appropriate and complete documentation to support its commitment to comply with Title VI, INDOT's Title VI Manager will issue a noncompliance letter and forward a copy to FHWA and may then take or participate in other legally available action against the subrecipient for failure to comply, such as withholding payment on a contract, and/or suspending or terminating the contract.

Following the expiration of 90 days, INDOT may do any of the following:

- a. Certify the current subrecipient compliant and eligible to receive funds,

- b. Identify the current subrecipient as deficient but on an approved corrective action plan, OR
- c. Issue a notice of failure to comply.

VIII. Data Collection and Analysis

General

Data Collection

Per 23 CFR § 200.9(b)(4) INDOT is required by federal regulations to collect statistical data on the race, color, and national origin of participants in and beneficiaries of its programs. The Title VI Manager works individually with each program area to develop a collected data set that will support both the internal audit and reporting to FHWA. Potential sources of data include but are not limited to, Census data, school districts, forms or surveys, management systems, land use plans, geographic information systems (GIS,) transportation models, and Metropolitan Planning Organization committees.

The Title VI Manager works with the program areas to consider economic and social impacts. Each program area's data process will include the following:

1. Defining the project and conducting demographic analysis
2. Developing a communications plan including specific EJ communication strategies for continuous and meaningful involvement
3. Identifying potential impacts, mitigation, and benefits
4. Documenting methodology, findings, and public involvement

The following is a brief description of data collection efforts conducted by INDOT:

INDOT Statewide Planning Process: As part of the Statewide Planning Process, INDOT staff analyze demographic maps that include median income levels per county, racial/ethnic makeup at the U.S. Census tract level, and trends regarding transportation equity. Additionally, demographic data will be collected at all public meetings hosted.

Language Assistance: The Technical Planning and Programming Division sends out an annual survey form to central office right of way, environmental planning, and district offices to collect data about the number of occasions INDOT staff has provided translation or interpretation services to members of the public. Feedback from this report form is included in the Title VI Goals and Accomplishments report.

Public Involvement: Public Involvement data collection procedures seek to identify and eliminate discrimination. INDOT will accomplish this task through its integrated transportation planning processes, including the public involvement process, for the statewide transportation plan and the federal statewide transportation improvement program. Data collection is necessary to analyze whether discrimination or lack of access occurs. The INDOT data collection tool, the Public Involvement Survey, is used to gather Title VI demographic data on the participants of public meetings/hearings. The intent is to gather a sufficient pool of data to determine whether INDOT is reaching Title VI population groups to allow those groups the ability to receive information and give input in the transportation decision-making process service area for other meetings/hearings. INDOT has recently invested in GIS software that layers demographic data, such as location, race, color, national origin, household, income, and education. The virtual link can be found at the [demographic survey](#). A more detailed description of INDOT’s Public Involvement data collection and analysis can be found in XIV herein. The paper copy of the demographic survey form is included herein as [Attachment H](#).

Right of Way, Real Estate Division: INDOT gathers demographic data from its internal Land Records System “LRS”, and other agency data sources as identified related to real estate transaction activity from relocations, condemnations, purchases, and other activities such as appraising. This demographic data is collected by paper survey during real estate transactions by INDOT-approved buyers and appraisers.

The Title VI liaison in the Real Estate Division as well as managers and supervisors of buying and appraising activity are tasked with identifying potential discriminatory issues as they arise and compiling this data on a quarterly basis to review with the Title VI Program Manager or designee to detect trends that may or may not be discriminatory practices and to adjust procedures and practices accordingly. If managers or liaisons identify a risk of discrimination in a particular transaction, they are trained and advised to immediately contact the Title VI Program Manager.

INDOT gathers additional information from its Professional Services contract records, including demographic information related to the opportunity to do business with INDOT and the equity of work assignments for professionals qualified to do appraising and buying work. Program area liaisons and managers in this division are trained to identify trends that may appear discriminatory. If such a trend is noted, the PARs and managers are required to promptly notify the Title VI Program Manager should an individual concern or complaint arise.

Environmental Planning: INDOT collects and analyzes U.S. Census and other data as a part

of the Environmental Justice analysis, regarding populations expected to be impacted by INDOT projects. Demographic data is collected during the environmental review process. Additionally, Environmental staff collect voluntary demographic data during public meetings.

INDOT's Environmental and Planning Division gathers and retains information that supports the selection of projects and their scopes, including route selection and any public involvement. In addition, the Environmental Division retains copies of NEPA analysis which determine what level of environmental study was required, as well as the actual environmental studies.

Environmental Studies will be provided to the INDOT Title VI Manager for review. The Title VI Program Manager will meet quarterly with the liaisons from the Environmental Planning Division to discuss recent decisions and to obtain any necessary supporting documents where there is a concern that requires further analysis.

Data Analysis

Once the Title VI data is collected, the data must be analyzed to identify patterns of discrimination or the potential for discrimination. Each program area is responsible for analyzing the data collected and recommending corrective action, as appropriate to the Title VI Manager. A pattern of discrimination may result from a specific process, or as the result of a process or procedure being implemented in a discriminatory manner.

INDOT's Title VI analysis involves pairing demographics and impacts/benefits. Our efforts toward improving data collection and analysis are ongoing. INDOT is continually improving our procedures and the use of demographic from sources such as the Census data, and school districts data analyzed with survey data. These improvements will address our growth areas in current data collection and analysis methods to provide greater effectiveness of the Plan. This analysis involves identifying the benefits and burdens of the planned project on the surrounding communities as well as identifying any disproportionate or disparate impact or burden on the minority populations, race, color, and national origin.¹

The Title Manager works with division and departmental program areas to strategize methods to collect and analyze Title VI-related data associated with each federal Program Area. Pursuant to 28 CFR 42.406(b), the following data can be collected and analyzed:

¹ Please note: The usefulness of data collected in any of the categories detailed herein is directly related to the sample size and whether or not the sample represents a statistically significant percentage of the population group at issue. Where a sufficient sample size cannot be achieved, INDOT will acknowledge this limitation in any Title VI analyses that use that data and clarify that the results may not be dispositive due to the lack of statistical significance.

1. The manner in which services are or will be provided by the program in question, and related data necessary for determining whether any persons are or will be denied such services on the basis of prohibited discrimination.
2. The population eligible to be served by race, color, and national origin to be served by race, color, and national origin, including Limited English Proficiency (LEP)
3. The location of existing or proposed facilities connected with the program, and related information adequate for determining whether the location has or will have the effect of unnecessarily denying access to any persons on the basis of prohibited discrimination.
4. The present or proposed membership by race, color, and national origin, in any planning or advisory body that is an integral part of the program.
5. Where relocation is involved, the requirements and steps used or proposed to guard against unnecessary impact on persons on the basis of race, color, and national origin.

Additional data can include:

1. Distribution of benefits (dollars, facilities, systems, projects) by groups and communities.
2. Statewide demographic profile as well as demographic profiles of affected communities.
3. Planned and actual funding distribution in project areas on, race, color, and national origin.
4. Projected population increases versus planned facilities and type of facilities.
5. Impacts of the location of existing or proposed facilities connected with a project.
6. Demographics of owners of property to be taken and persons or businesses to be relocated or adversely affected, including race, color, national origin (including language), and disability status
7. Language assistance needs assessment.
8. Results of compliance reviews and recommended work plan tasks designed to achieve compliance.

IX. Training

Internal Training

INDOT has implemented both in-person training and online training which is offered through INDOT's SuccessFactors platform.² The online courses include an assessment that ensures adequate participation and knowledge retention since they are self-learning tools.

New Staff: New employees will receive training as part of INDOT's onboarding process. This training may be online via SuccessFactors. Training includes viewing Title VI, ADA, and LEP videos followed by a brief multiple-choice test. The completion of the training is retained in the employee's SuccessFactors account.

² SuccessFactors Title VI training platform training is only available to INDOT employees.

All Staff: Training for all staff will occur at a minimum of one hour to all employees annually. The training may be offered on more than one day or recorded via SuccessFactors to accommodate work schedules.

Directors: This training is specifically tailored to identify and address major challenges and special emphasis areas. It will occur annually and functions as part training and part debriefing regarding highlights, and challenges from the previous reporting year.

Program Area Staff: Training will occur semi-annually and will focus on major challenges and special emphasis areas in each program area. It will highlight challenges that require coordination between the program areas.

Title VI Liaisons and PARs: All Title VI Liaisons and PARs receive in-person training targeted toward their work area and program requirements. Training will be conducted semi-annually and will provide liaisons and PARs with the opportunity to discuss issues, ask questions regarding reviews, review specific scenarios, and share experiences. The training will provide Title VI requirements and methods to apply the requirements to program areas. This training will provide the liaisons and PARs with the necessary tools to conduct departmental staff training.

External Training

Subrecipient Training: INDOT conducts annual live in-person and virtual via Microsoft Teams training to LPA subrecipients. This platform allows a question-and-answer session for LPAs to aid in maximum compliance. Additionally, the Title VI Program Manager offers an external online training module to satisfy the training needs of Subrecipients, Consultants, and Contractors in an on-demand manner.³ The Title VI Manager provides individual (one-on-one) technical training to Subrecipients on an “as-needed basis” and specialized training upon request.

The Title VI Program Manager requires all LPAs to participate in training annually. The LPAs can attend the annual live virtual training or an online Subrecipient Title VI training, or request a specialized Title VI training, in which case, the Title VI Program Manager will schedule a time to train the LPA’s Title VI Manager and agency staff. Subrecipients are required to conduct annual Title VI training with their respective agency’s employees and document the results. INDOT’s Title VI Manager will review LPA’s training requirements

³ Consultant contractor online training: <https://www.in.gov/indot/accessibility-and-non-discrimination/title-vi-ada-information-and-resources-for-consultants-and-contractors/>

LPA online training website is currently being updated and will be located at: <https://www.in.gov/indot/accessibility-and-non-discrimination/nondiscrimination-at-indot/>

for compliance during the external review process.

X. Complaint Disposition Procedures

Complaint Policy

INDOT promptly reviews complaints received and refers them to the FHWA. FHWA is responsible for all decisions regarding whether a complaint should be accepted, dismissed, or referred to another agency.

How are complaints routed?

Complaints are routed in the following ways:

1. All complaints are routed to the FHWA Headquarters Office of Civil Rights (HCR) for processing. HCR is responsible for all determinations regarding whether to accept, dismiss, or transfer Title VI complaints filed against INDOTs or Subrecipients of Federal financial assistance.
2. Complaints are forwarded from the initial receiving agency through the Federal-aid highway oversight hierarchy until the complaint reaches HCR. For example, if a complaint is filed with a Subrecipient City, that receiving agency should forward the complaint to INDOT, which should forward the complaint to the State's FHWA Division Office, which should forward the complaint to HCR. If a complaint is filed with INDOT, then INDOT should forward the complaint to the State's FHWA Division Office, which should forward the complaint to HCR.
3. INDOT and Subrecipients must log all complaints received.
4. When HCR decides on whether to accept, dismiss, or transfer the complaint, HCR will notify the Complainant, the FHWA Division Office, INDOT, and Subrecipient (where applicable).

What are the potential outcomes for processing a complaint?

There are four potential outcomes for processing complaints:

1. **Accept:** if a complaint is timely filed, contains sufficient information to support a claim under Title VI, and concerns matters under FHWA's jurisdiction, then HCR will send to the complainant, the respondent agency, and the FHWA Division Office a written notice that it has accepted the complaint for investigation.
2. **Preliminary review:** if it is unclear whether the complaint allegations are

sufficient to support a claim under Title VI, then HCR may (1) dismiss it or (2) engage in a preliminary review to acquire additional information from the complainant and/or respondent before deciding whether to accept, dismiss, or refer the complaint.

3. Procedural Dismissal: if a complaint is not timely filed, is not in writing and signed, or features other procedural/practical defects, then HCR will send the complainant, respondent, and FHWA Division Office a written notice that it is dismissing the complaint.
4. Referral\Dismissal: if the complaint is procedurally sufficient but FHWA (1) lacks jurisdiction over the subject matter or (2) lacks jurisdiction over the respondent entity, then HCR will either dismiss the complaint or refer it to another agency that does have jurisdiction. If HCR dismisses the complaint, it will send the complainant, respondent, and FHWA Division Office a copy of the written dismissal notice. For referrals, FHWA will send a written referral notice with a copy of the complaint to the proper Federal agency and a copy to the USDOT Departmental Office of Civil Rights.

HCR is responsible for conducting all investigations of INDOT and other primary Recipients. In the case of a complaint filed against a Subrecipient, HCR may either conduct the investigation itself, or it may delegate the investigation to the primary Recipient, INDOT. If HCR chooses to delegate the investigation of a Subrecipient, HCR will communicate its acceptance of the complaint to the complainant and respondent, but INDOT will conduct all data requests, interviews, and analysis. INDOT will then create a Report of Investigation (ROI), which it will send to HCR. Finally, HCR will review the ROI and compose a Letter of Finding based on the ROI. All Letters of finding issued by FHWA are administratively final.

INDOT's Complaint Policy

INDOT has a complaint policy for complaints of discrimination related to Title VI and will promptly investigate all complaints transferred to INDOT from HCR. INDOT will also attempt to resolve such complaints and take corrective action upon a finding of a substantiated complaint. Within 60 days of receiving a complete complaint, INDOT will submit its final confidential investigative report to FHWA. INDOT's current complaint process provides a procedure for appeal of all unsubstantiated claims of discrimination.

INDOT's complaint procedures outlined below reflect INDOT's current policies and procedures.

Complaint Investigation Procedures

Complaints are not considered received until they are submitted to INDOT as complete

complaints, both signed and in writing. INDOT will determine whether the person or entity purportedly engaged in the alleged discriminatory act is an INDOT subrecipient (the legal entity to which INDOT made a sub-award of federal funds and which is accountable to the INDOT for the use of the funds provided). If the complaint does not specifically mention that the alleged discriminatory actor is an INDOT subrecipient, INDOT may presume so in deciding whether to accept the complaint for further processing. These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 and its related statutes, regulations, and directives, as amended. These procedures do not affect the right of the Complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies, such as punitive or compensatory damages for the Complainant. INDOT will make every effort to facilitate a voluntary early resolution of complaints at the lowest level possible. INDOT may exercise the option of informal resolution at any stage of the process.

Who May File a Complaint?

Any person who believes that he or she has been excluded from participation in, denied the benefits of or otherwise subjected to discrimination under any INDOT service, program, or activity whether federally funded or not, based on their race, color, or national origin may file a complaint. A complainant's representative may also file a complaint on behalf of such a person.

Timeliness of complaint

For a complaint against INDOT or a subrecipient to be considered timely, it must be filed within 180 calendar days after the alleged incident has occurred. The filing date of a complaint is the earlier of the postmark or the date a signed, written complaint is received by INDOT. INDOT may determine on a case-by-case basis whether to waive the 180-calendar daytime limit for a "good cause" at its discretion. Good cause for a waiver shall include but is not limited to, lack of knowledge or incapacity.

Lack of Knowledge

INDOT may waive the time limit in situations where the person on whose behalf the complaint was filed did not know of and could not have reasonably known of the violation during the 180-day time limit. The complainant must file his or her complaint within 60 days of becoming knowledgeable of the violation.

Incapacitation

INDOT may also waive the time limit in situations where the person on whose behalf the complaint was filed was incapacitated because of illness or other incapacitating circumstances. The Complainant must provide independent documentation of the

purported incapacitation. The complainant must file his or her complaint within 60 days after the period of incapacity ends.

Location and Availability of Complaint Forms: INDOT provides complaint forms online via the INDOT website <https://www.in.gov/indot/3584.htm>.

The form is included herein as [Attachment I](#).

Contact the Title VI Program Manager to request a copy of the complaint form via email, facsimile, or United States mail. The Program Manager provides copies of the complaint form in alternative formats upon request and provides copies of the form in Spanish and other languages as determined by INDOT's LEP plan. Complainants are encouraged, but not required, to use the complaint form when filing a complaint.

How To File a Complaint

A complainant may preliminarily submit his or her complaint by online form submission, mail, facsimile, or email. However, the complainant must submit a signed, original copy of the complaint by first-class U. S. Postal Mail to the Title VI Program Manager to officially begin the complaint process. Any person with a disability may request to file his or her complaint using an alternative format. INDOT does not require a complainant to use the INDOT complaint form when submitting his or her complaint. A copy of INDOT's Complaint

Direct all complaints of discrimination pursuant to Title VI to:

Title VI Program Manager & Title VI
Manager Indiana Department of
Transportation
100 N. Senate, Room N755
Indianapolis, IN 46204
Email address: AccessForAll@indot.in.gov

And/or
Federal Highway Administration Headquarters - Office of Civil
Rights 1200 New Jersey Avenue, SE HCR-40, Room E81-101
Washington, DC 20590
202-366-0693 or Fax: 202-366-1599
TTY: 202-366-5751

Additionally, complaints may be filed with the U.S. Department of Justice at:
Federal Coordination and Compliance Section -
NWB Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.

Washington, D.C. 20530

Elements of a Complete Complaint

A complaint must be both written and signed to be complete. Verbal complaints must be reduced to writing and provided to the complainant for confirmation, review, and signature before processing. The complaint form is available for download from the INDOT website at: <https://www.in.gov/indot/3584.htm>.

A complaint must include the following information:

1. The full name and address of the complainant
2. The full name and address of the respondent, which may be the individual, agency, department, or program that allegedly discriminated against the complainant;
3. A description of the alleged discriminatory act(s) that violated Title VI (i.e., an act of intentional discrimination or one that has the effect of discriminating on the basis of race, color, or national origin; and
4. The date of occurrence.

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

1. Anonymous complaints
2. Inquiries seeking advice or information
3. Newspaper articles
4. Courtesy copies of court pleadings
5. Courtesy copies of complaints addressed to other agencies
6. Courtesy copies of internal grievances
7. Oral complaints

The Title VI Program Manager shall notify the complainant in writing if his or her complaint is incomplete and allot 15 calendar days for the Complainant to respond and provide the supplemental information needed to complete the complaint.

Processing Complaints: The Title VI Program Manager processes all complaints.

Logging Complaints: The Title VI Program Manager will note the complaint in the log by sequential case number based on the year, month, and order in which INDOT received the complaint. For example, if INDOT received a complaint on March 4, 2023, the case number would be 2023-03-04.

Acknowledging receipt: The Title VI Program Manager will acknowledge receipt of the complaint and inform the Complainant of the action taken or proposed action to be taken to process the complaint by letter. This acknowledgment letter shall include a restatement of the complaint, a brief statement of INDOT’s jurisdiction over the subrecipient, and contact information for the investigator assigned to conduct the investigation.

FHWA Notice: INDOT shall forward the complaint to the FHWA within 10 business days of receipt of the complaint for assignment.

Respondent Notice: If assigned by HCR, INDOT forwards a notice via certified mail to the Respondent informing them of the allegations, requesting a position statement, and providing the name and telephone number of the Title VI Program staff person assigned to investigate the complaint.

Complainant Notice: INDOT informs the Complainant that he or she has a right: (1) to have a witness or representative present during any interviews and (2) to submit any documentation he or she perceives as relevant to proving the allegations contained in the complaint.

Opportunity to Respond: INDOT will provide the Respondent with a reasonable opportunity to respond to all aspects of the Complainant's allegations.

Witnesses: INDOT will determine if witnesses will be contacted and interviewed as part of its investigation.

Additional Information: INDOT may reach out to gather additional information from the parties. Investigative Report: INDOT will draft a confidential investigative report (IR) and forward a copy of the same to the FHWA within 180 calendar days following the receipt of the complaint by INDOT.

The report shall not be disclosed to the Complainant or Respondent. The report typically includes the following:

1. A summary of the written complaint
2. A brief description of the standard of review/methodology used to investigate the complaint
3. Summarized statements taken from witnesses interviewed by INDOT
4. Findings of fact and an analysis of the evidence gathered. The analysis should address each allegation in the complaint and the Respondent's position
5. A determination, based on the preponderance of evidence presented, of whether the complaint is substantiated or unsubstantiated; and • Proposed corrective action for substantiated cases

Letter of Findings: INDOT is responsible for drafting a Letter of Findings (LOF) and mailing the LOF to the FHWA, Respondent, and Complainant within 180 calendar days of the date the complaint was received by INDOT. The LOF may include the following:

1. A summary of the written complaint

2. A brief description of the standard of review/methodology used to investigate the complaint
3. Findings of fact and an analysis of the evidence gathered. The analysis should address each allegation in the complaint and the Respondent's position
4. A determination, based on the preponderance of evidence presented, of whether the complaint is substantiated or unsubstantiated
5. Proposed corrective action for substantiated cases

In accordance with DOT Order 1000.12, INDOT shall keep all Complainants' identities confidential except to the extent necessary for carrying out an investigation. If an investigator determines that it is necessary to disclose the Complainant's identity to the Respondent or a third party, the investigator must first obtain the Complainant's written permission.

INDOT may refer complaints to the appropriate agency or entity without obtaining permission as referral may be required. INDOT will notify the Complainant of the referral at the time the referral is made. Otherwise, INDOT shall obtain a Complainant's written consent before providing a copy of the complaint to the Respondent or a third party.

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

XI. Compliance and Enforcement Procedures

Identification & Elimination of Discrimination

INDOT's compliance procedures are detailed throughout this Plan document. This includes a wide range of efforts across the agency, such as the program review process, training and technical assistance initiatives, complaint handling, and data on the impacts of INDOT activities on Title VI populations. The totality of the procedures, described above facilitates the coordination, oversight, monitoring, and corrective action initiatives of INDOT's Title VI Manager, liaisons, and PARs. By way of a brief non-exhaustive overview, the following activities are relied upon by INDOT's Title VI Manager, liaisons, and PARs as mechanisms for compliance and enforcement:

1. Requiring prequalification self-certification reports, of each subrecipient to ensure they are utilizing best practices and maximizing their compliance profiles, where needed;
2. Program Area Division departmental reviews and the issuance of departmental work plans, if necessary, to monitor and ensure the use of best practices for Title VI compliance;
3. Mandatory training for staff and subrecipients to understand their Title VI obligations as

partners in the programs, services, and activities of INDOT as a transportation federal funding recipient;

4. Investigations of allegations of noncompliance with Title VI and related nondiscrimination requirements;
5. Information sharing with subrecipients and project partners to detail where adherence to Title VI requirements serves as value added to the development of a transportation project;
6. External assessments of sub-recipients programs, services, and activities to identify Title VI risk factors and possible mechanisms to minimize them, including the issuance of work plans to ensure progress and accountability;
7. Regular coordination meetings with agency leadership to highlight any areas of concern and recommended strategies to address them; this includes working with staff, management, and subrecipients to achieve voluntary compliance on all Title VI obligations and to exercise delegated authority to recommend and require corrective actions;
8. Remedial Action when sub-recipient compliance is not met which includes but is not limited to a corrective action plan (CAP) with projected due dates; cancel, terminate, or suspend the contract or agreement in whole or in part; refrain from extending any further assistance to the recipient under the program concerning which the failure or refusal occurred until satisfactory assurance of future compliance has been received from the sub-recipient; take such other action that may be deemed appropriate under the circumstances, until compliance or remedial action has been accomplished by the recipient; refer the case to the appropriate federal agency for appropriate administrative or legal proceedings; other means authorized by law.
9. When the sub-recipients deficiency status changes to non-compliance status enforcement actions include:
 1. submitting two copies of the case file to FHWA with a recommendation that the subrecipient be found in noncompliance; and/or,
 2. with the concurrence of FHWA (or other USDOT OA), initiate proceedings to impose sanctions for noncompliance.

XII. Review Of State Directives

The Title VI Manager works collaboratively with the Legal Operations Director to ensure policies and procedures conform with the Civil Rights Act of 1964 and other federal nondiscrimination mandates. The Title VI Manager is included in the review process as policies are routed to legal as outlined below.

The Policy Approval Process sets forth the requirements and responsibilities related to creating and implementing a policy and differentiates between a policy and a procedure.

POLICY APPROVAL PROCESS

1. Deputy Commissioner (DC) approves vetting an idea for a policy. Only DCs can approve the creation of a policy.
2. The DC advises the Executive Team that a policy has been proposed, and the Executive Team must approve the proposed policy.
3. Meetings are held.
 - Complete a form that lists all potentially impacted departments.
 - Meetings are held with all potentially impacted departments.
 - May want to include external stakeholders (including Federal Highway Administration, Indiana Department of Administration, State Personnel Department, and others.).
4. DC or their designee is responsible for starting the draft of the policy. DC or their designee sends a draft policy to the Legal Operations Director (LOD) to be vetted.
5. LOD places the proposed policy on Sharepoint for comments.
6. Comment Period – A set time to allow designated representatives from each impacted area to comment directly on the proposed policy on Sharepoint.
7. Policies vetted through each division and then routed to LOD when review is completed at each stage:
 - a) Legal to ensure compliance with laws, regulations, and rules.⁴
 - b) Finance/Internal Audit (concurrently)
 - c) Back to Legal to Review Suggested Changes
 - d) Communications
8. LOD routes vetted policy back to DC.
9. DC is responsible for vetting and external stakeholders, as needed. If changes are made by external stakeholders, the policy is then routed back through the process in Step 7.
10. DC provides the effective date of the implementation of the policy.
11. The policy is finalized for signature. Legal will determine who is able to sign the policy & obtain the signatures.
12. Federal agency signatures (if required).
13. The finalized policy is sent to LOD for the repository.
14. LOD to send the policy to Communications for dissemination.
15. DC is responsible for adoption and implementation throughout the agency.

Additionally, by conducting Title VI compliance reviews, INDOT ensures that Title VI requirements are included in program directives and that procedures used have built-in safeguards to prevent discrimination. Any directive identified by Program Division Heads and/or Title VI liaisons as non-compliant will be referred to the Civil Rights Counsel.

⁴ The Title VI Manager is housed within Legal and is included in the vetting process to ensure the proposed policy or procedure does not contain any Title VI violations.

Outside the Agency, before awarding funds for any local government project, the Title VI Manager is contacted to secure information regarding assurances, plans, or other relevant Title VI considerations that have been met. If it is determined that directives do not meet the requirements of Title VI and other related statutes, the Title VI Manager advises the appropriate Program Manager and provides recommendations for ensuring compliance.

XIII. Dissemination of Information

The Title VI Manager works with agency staff to develop and disseminate Title VI program information to INDOT employees and sub-recipients, including contractors, subcontractors, consultants, sub-consultants, and beneficiaries, as well as the public. Determinations regarding the nature of the information to be disseminated and the members of the public with whom that information will be shared are generally done by considerations of project location and impact. Internally, the Title VI Plan is provided to INDOT employees electronically. The Plan is also made available on INDOT's website.

Publicly disseminated information includes postings of official statements, the inclusion of Title VI language in contracts or other agreements, displays at public information open meetings proceedings, and informational brochures. INDOT ensures public service announcements or notices are posted of proposed projects, hearings, meetings, or formation of public advisory boards, in newspapers or other media reaching the affected community. The community is identified through a review of statistical data gathered by the Planning and STIP team with regard to the residential and business communities in and around the project area.

INDOT further ensures the full utilization of available minority publications or media; and, where appropriate, provides written or verbal information in languages other than English. The Title VI Manager works with the INDOT Office of Communications to ensure that current information is available and accessible on the INDOT website. These activities are undertaken to ensure that the public is educated about their rights, pursuant to Title VI, relative to the transportation decision-making process.

During public information meetings and other meeting opportunities, surveys and comment cards are provided for feedback. The feedback includes information regarding demographics and public opinions.

Notification to Beneficiaries - Website

INDOT's website is designed to ensure Title VI information is readily accessible to the

public. The website informs the public of their rights under Title VI and provides information on how to file a complaint. Title VI information available on INDOT's website includes:

1. INDOT's Title VI Plan
2. Title VI and Related Statutes Nondiscrimination Statement (English and Spanish)
3. Title VI Nondiscrimination Assurances
4. INDOT's Title VI Annual Goals & Accomplishment Report
5. INDOT's External Discrimination Complaint Form (English and Spanish)
6. Title VI Requirements for Subrecipients ([Attachment J](#))
7. INDOT's Title VI Technical Assistance Guide for Subrecipients
8. INDOT's Language Assistance Plan

Notification to Beneficiaries - Posters and Brochures

INDOT provides posters, brochures, and survey cards at every public hearing and meeting. These program posters and brochures are available in languages other than English, as needed.

XIV. Public Involvement

INDOT re-designed its public involvement strategy to become more in compliance with 23 CFR 450.210. The Planning, STIP, Technical Planning & Programming Divisions assist in the public's awareness and participation in the planning of long-term twenty to thirty-year projects, including those that will require National Environmental Policy Act (NEPA) federal legislation pertaining to public involvement in project development by state departments of transportation throughout the country.

INDOT currently utilizes its 2023 Planning Public Involvement Plan (PPIP) and the Planning Outreach Procedure (POP). The PPIP explains when and how public outreach is to take place, including outreach to traditionally underserved populations, race, color, and national origin. https://www.in.gov/indot/files/INDOT_PPIP_12.6.pdf

Traditionally, INDOT has relied on, a paper public involvement survey as a tool to collect information regarding persons affected by proposed transportation projects. The survey permitted persons to remain anonymous, while voluntarily answering questions regarding their, race, color, or national origin. INDOT distributed the paper public involvement survey at all public hearings and meetings. A spreadsheet tool like Excel was used to document Title VI demographics, and public comments, and process them.

Today, with advanced technology, INDOT has incorporated GIS software-based solutions to refine our process. These modern comment analysis techniques and tools began being

integrated into the work of INDOT. INDOT has recently invested in software to support the cataloging of demographics and public comments. This software allows INDOT to document, map, categorize, and facilitate the response to public comments. The software tool is located at <https://veravoicesurvey.com/all-surveys/indot-public-involvement>. The developers are currently working on adding the demographic survey questions to the survey contained in the above link. Please note, the above link is the public-facing link to the software. Only a few INDOT employees have the ability to analyze and report on the data collected by the survey.

The software is also being refined to detail the number of comments by race, color, and national origin within a demographic area. As this GIS tool was only developed this summer, INDOT continues to work with our developers to add features for data collection and reporting to make the most use of the tool and capture Title VI and other needed information to be used throughout the organization.

INDOT's virtual public involvement survey which can be located at the [demographic survey](#) link. INDOT now uses this virtual survey at meetings and hearings. The facilitator of the meeting or hearing is responsible for making an announcement at the beginning and end and sharing the survey via QR codes with the attendees as well as the purpose of the survey. The facilitator shall then request the attendees complete the survey. For current data specific to this area, please refer to INDOT's Goals and Accomplishments report. INDOT's Planning Public Involvement Plan (PIIP) and the Planning Outreach Procedure (POP) can be found online at: <https://www.in.gov/indot/2366.htm>. The Planning Program Public Involvement Process is available at: <https://www.in.gov/indot/public-involvement/public-involvement/>. Additionally, INDOT utilizes the PIIP and online Public Involvement Toolbox. Link: <https://www.in.gov/indot/public-involvement/public-involvement/public-involvement-toolbox/>. The actual paper copy is attached hereto as [Attachment H](#).

XV. Limited English Proficiency (LEP)

One of INDOT's program goals in implementing and adhering to its Title VI obligations is to improve the accessibility of its programs and activities to eligible Limited English Proficiency (LEP) persons, e.g. those persons who have a limited ability to read, write, speak or understand English. INDOT continues to strive to improve its data collection efforts to better track the actual LEP individuals encountered in the delivery of services so that INDOT may continue to evaluate the effectiveness of its LEP Implementation Plan. Training provided to INDOT employees in person or via the online module contains information about LEP requirements and tools INDOT uses to gather information on an

ongoing basis about LEP needs.

Translations (of vital documents) must be in each LEP language group that is 5% or 1,000 people (whichever is less) of the total population eligible to be served. Providing these translations shows compliance and provides a “safe harbor” for transit providers that receive federal funding.

INDOT’s LEP information-gathering tools include the use of the following:

1. Internal LEP Report Form
2. “I Speak” Cards
3. The public's ability to request language and translation services as appropriate.
4. Use of demographic information, not limited to but including census information to determine whether LEP resources and/or alternative advertising measures should be considered as part of public involvement activities. (This information can be found in our LEP Plan)
5. Employee language questionnaires

LEP information is included in INDOT’s internal training. Customer service staff will track, record, and monitor the number of LEP requests and individuals encountered.

INDOT’s LEP Plan is included herein as [Attachment K](#).

XVI. LIST OF ATTACHMENTS

- **Attachment A:** Standard USDOT Title VI Assurances
- **Attachment B:** Title VI Policy Statement
- **Attachment C:** Organizational Charts
- **Attachment D:** Liaisons & Pars
- **Attachment E:** Sample Questions for Program Area Reviews
- **Attachment F:** Self-certification LPA Title VI Checklist
- **Attachment G:** Sub-recipient VCAP letter
- **Attachment H:** Title VI Public Involvement Survey
- **Attachment I:** Title VI Complaint Form
- **Attachment J:** Title VI Sub-recipient requirements
- **Attachment K:** INDOT LEP Plan

Attachment A

Standard U.S. DOT Title VI Assurances **DOT Order No.1050.2A**

The *Indiana Department of Transportation (INDOT)* (herein 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, (FHWA) 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);
- 49 C.F.R. Part 21 (entitled Nondiscrimination 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);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance 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 (FHWA).

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Nondiscrimination 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 nondiscrimination 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 agrees with and gives the following Assurances with respect to its federally assisted 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. The Recipient will insert the following notification in all solicitations for bids, Requests for Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal-Aid Highway Program and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The Indiana Department of Transportation in accordance with the provisions of 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 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 in consideration for an award."

1. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
2. The Recipient will insert the clauses 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, use, or improvements thereon or interest therein to a Recipient.
3. 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.
4. 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.
5. 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, licenses, permits, or 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; and
 - 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.
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 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.
7. 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, consultants, 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.
8. 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, *the Indiana Department of Transportation* 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 FHWA 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 *FHWA*. You must keep

records, and reports, and submit the material for review upon request to, FHWA, 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 law or detailed in program guidance.

The Indiana Department of Transportation gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal 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, sub-grantees, contractors, subcontractors and their subcontractors, transferees, successors in interest, and any other participants in the *Federal-Aid Highway Program*. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Executed this 27th day of September by:

By: 

Michael J. Smith, Commissioner
Indiana Department of Transportation

APPENDIX A

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 (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, the Federal Highway Administration, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Nondiscrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Nondiscrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Federal Highway Administration to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Federal Highway Administration, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or

is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

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

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the Indiana Department of Transportation will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, United States Code of Federal Regulations, the Regulations for the Administration of Federal Aid Highway Program, and the policies and procedures prescribed by the FHWA 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 pertaining 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 Indiana Department of Transportation 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 *Indiana Department of Transportation (INDOT)* 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 will be binding on *INDOT*, its successors and assigns.

INDOT 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 will 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 with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that *INDOT* will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, 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 non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in 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 in order to make clear the purpose of Title VI.)

APPENDIX C

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

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

1. The (grantee, lessee, 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:
 - a. 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.
2. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Nondiscrimination covenants, the INDOT will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
3. With respect to a deed, in the event of breach of any of the above Nondiscrimination covenants, the INDOT will have the right to enter 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 the 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.)

APPENDIX D

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 into by the *Indiana Department of Transportation (INDOT)* 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 *INDOT* 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, the *INDOT* will there upon revert to and vest in and become the absolute property of the *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.)

APPENDIX E

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 Nondiscrimination 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); 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 U.S.C. §§ 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 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. 1681 *et seq.*).



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N758
Indianapolis, Indiana 46204

PHONE: (855) 463-6848

Eric Holcomb, Governor
Michael Smith, Commissioner

TITLE VI AND RELATED STATUTES NONDISCRIMINATION POLICY STATEMENT

INDOT is committed to nondiscrimination compliance on the grounds of race, color, and national origin, as provided by Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, Section 504 of the Rehabilitation Act, Americans with Disabilities Act of 1990 (ADA), Title II of the ADA, Executive Order 12898 (Environmental Justice), Executive Order 13166 (Limited English Proficiency). INDOT’s policy is to ensure no person is excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the U.S. Department of Transportation (DOT) on the grounds of race, color, or national origin.

INDOT values individual civil rights and intends to provide equal opportunity and equitable service for the citizens of this state. INDOT strives to achieve nondiscrimination in its programs, services, and activities, directly or indirectly regardless of whether those programs, services, and/or activities are federally funded. Whenever INDOT distributes federal-aid funds to a second-tier subrecipient, INDOT will include Title VI language in all written agreements with that entity.

INDOT’s Commissioner, Michael J. Smith delegates full authority to the Civil Rights Counsel /Title VI Program Manager to implement and oversee INDOT’s Title VI program.

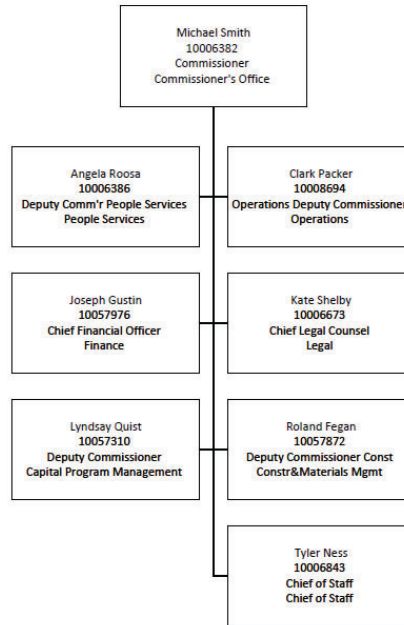
Michael J. Smith, Commissioner
Indiana Department of Transportation

9/27/2024

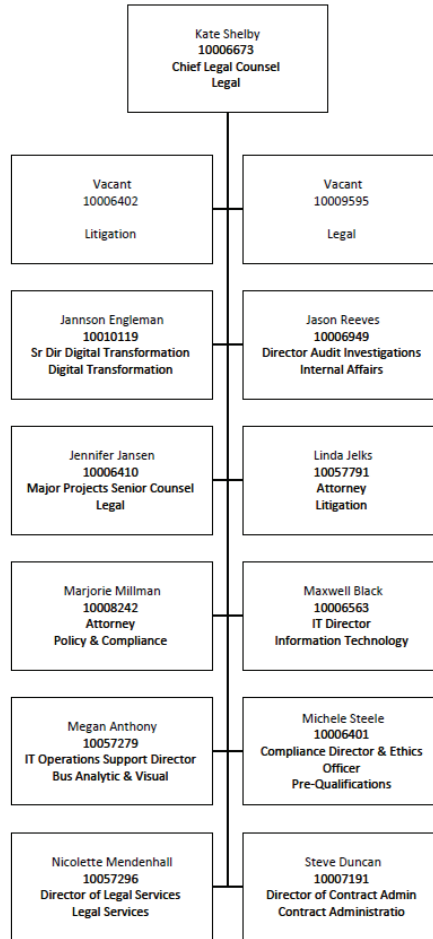
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Attachment C

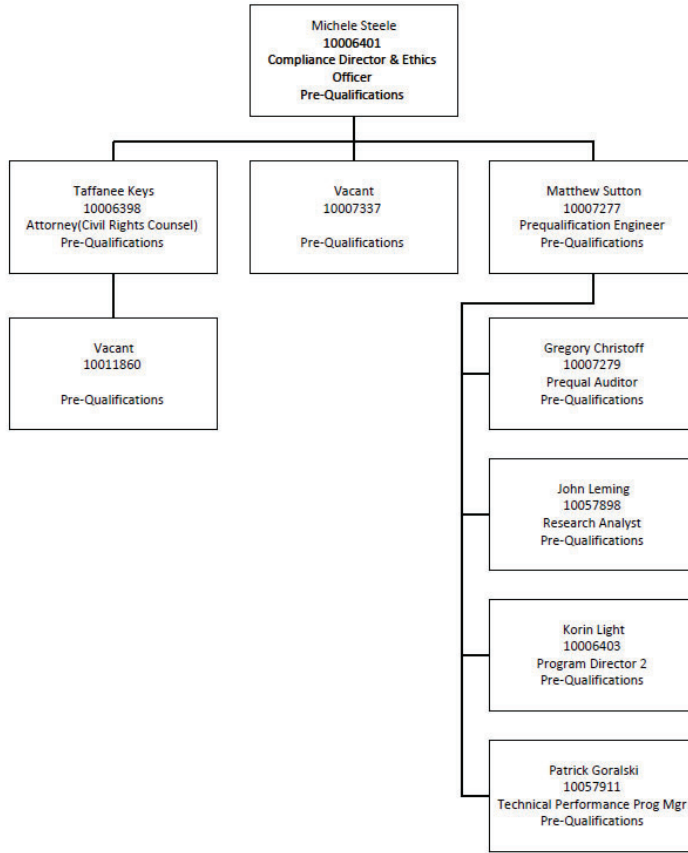
Indiana Department of Transportation August 2024



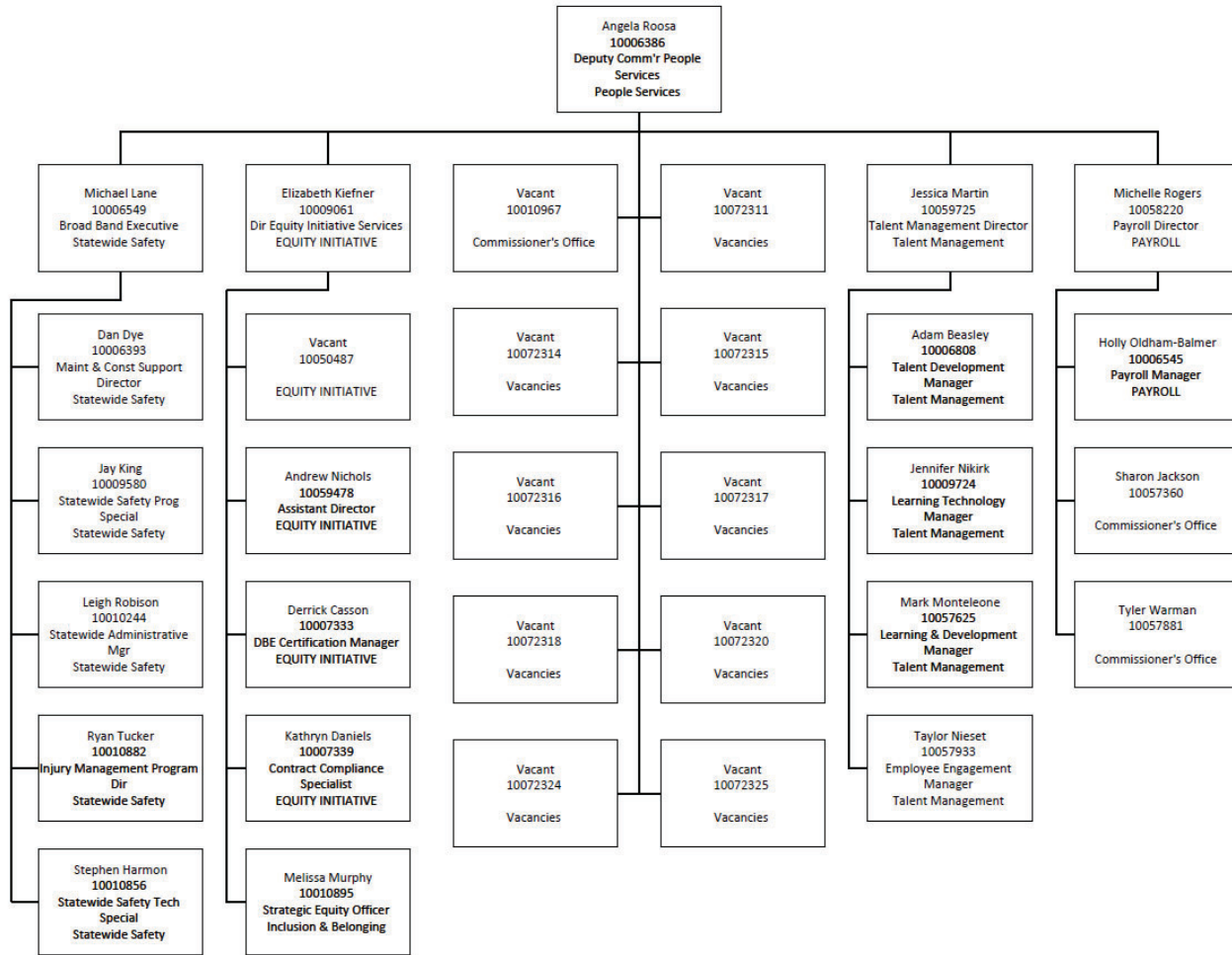
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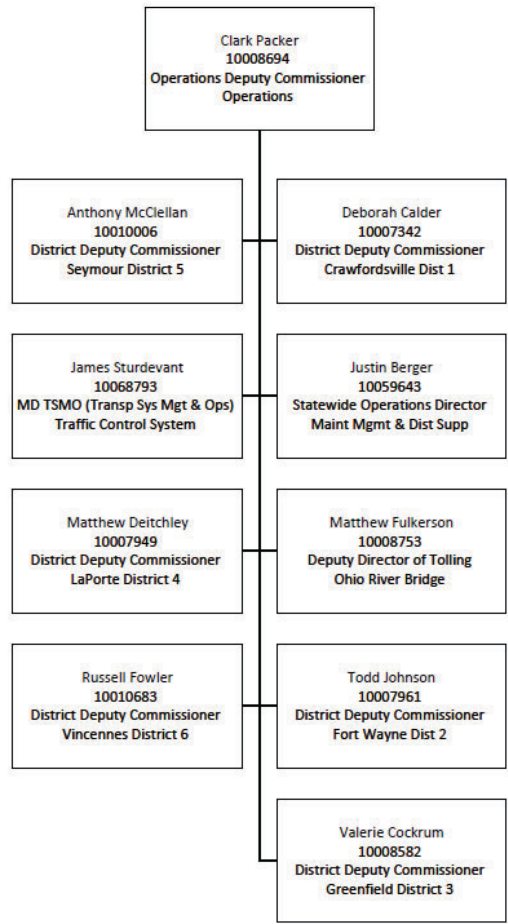
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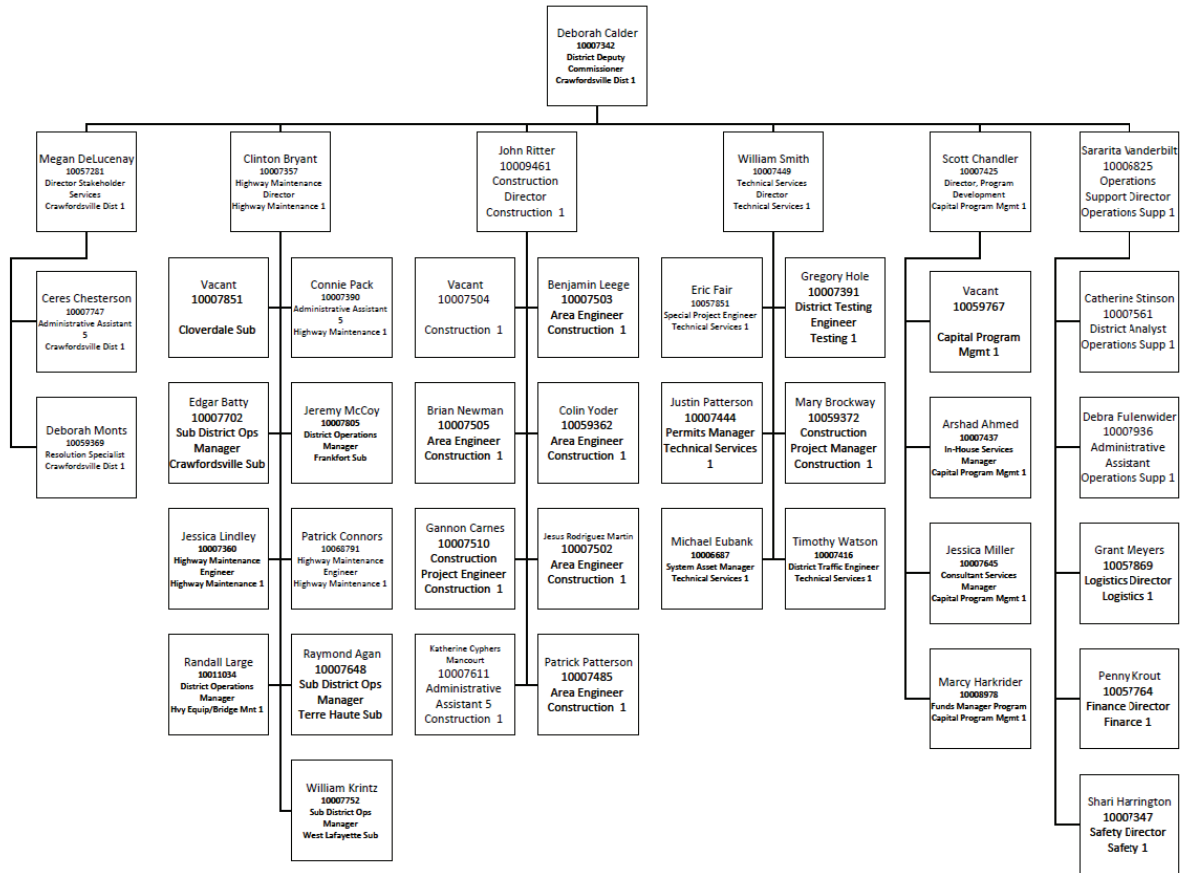
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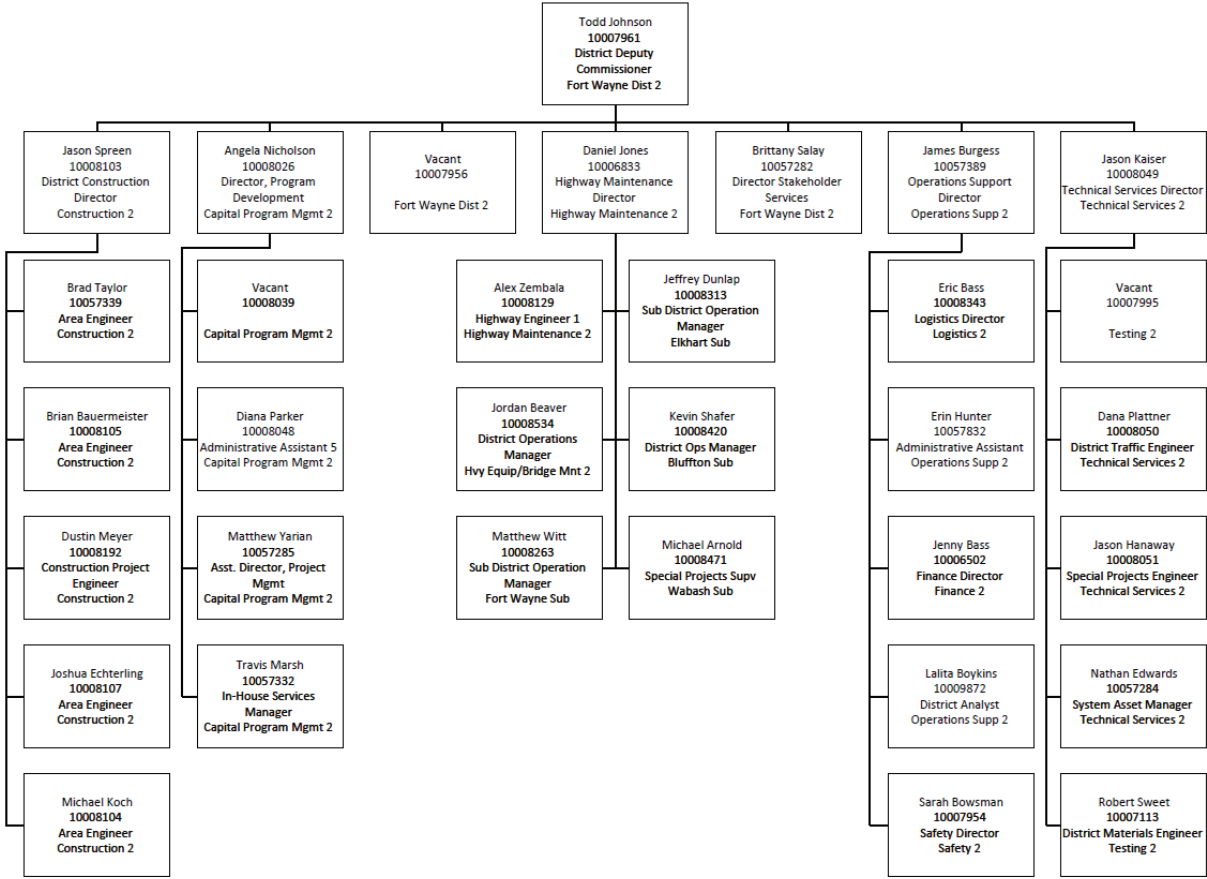


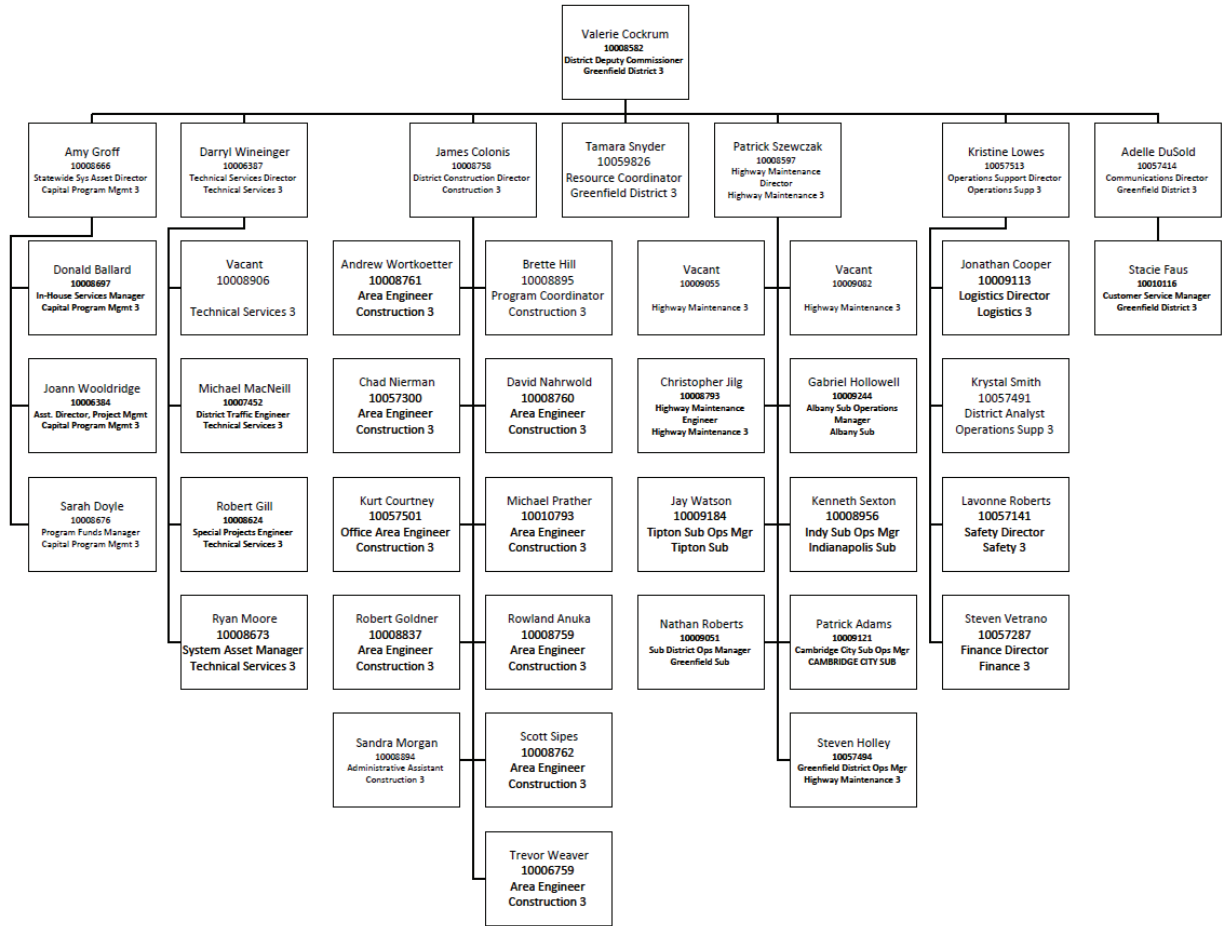
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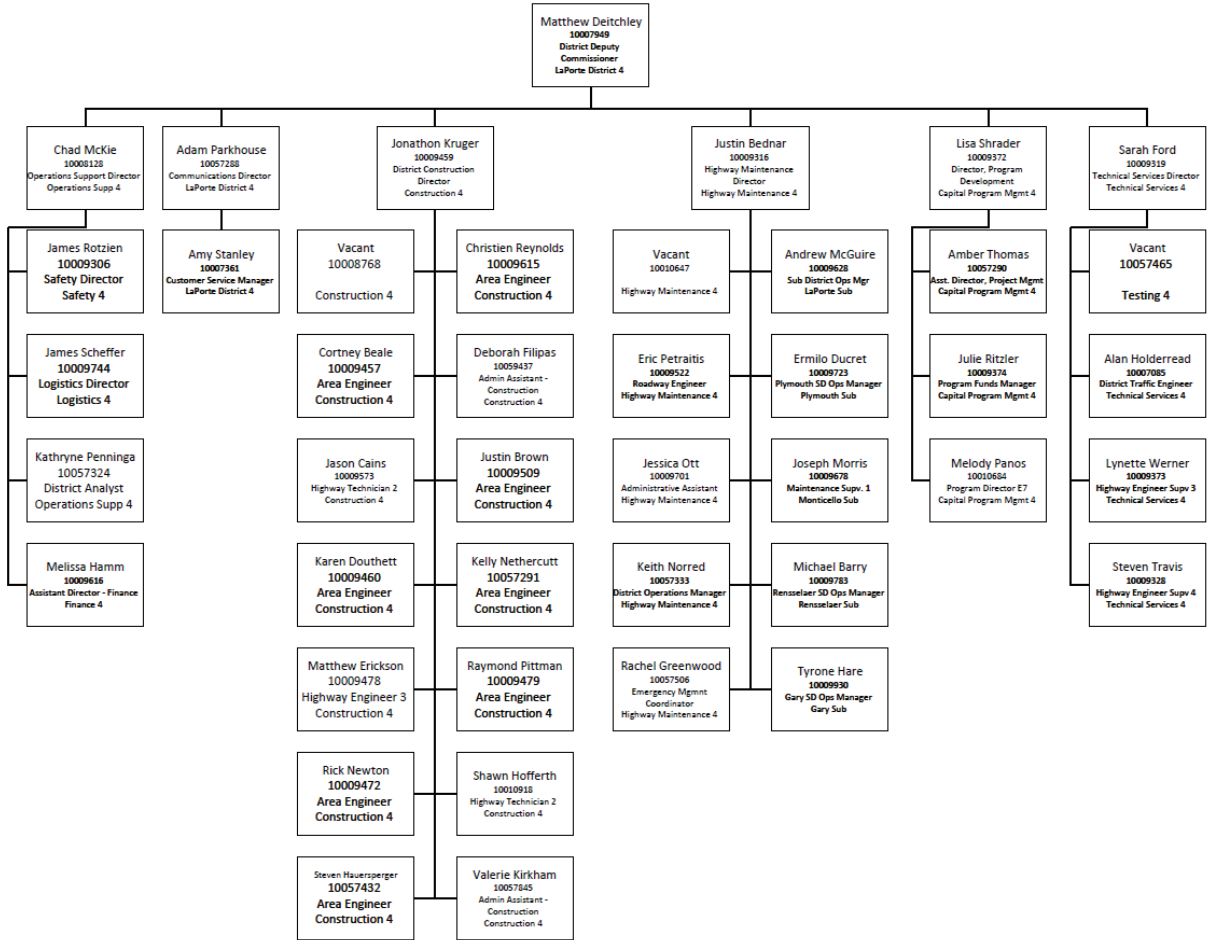


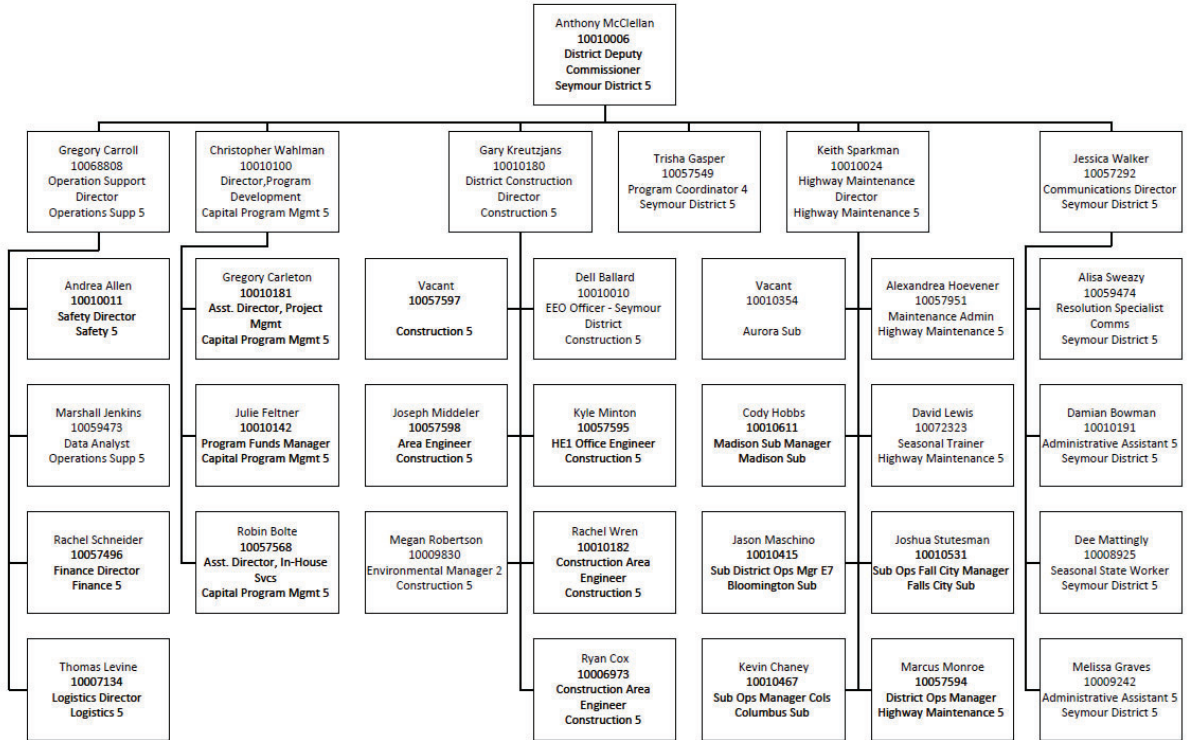
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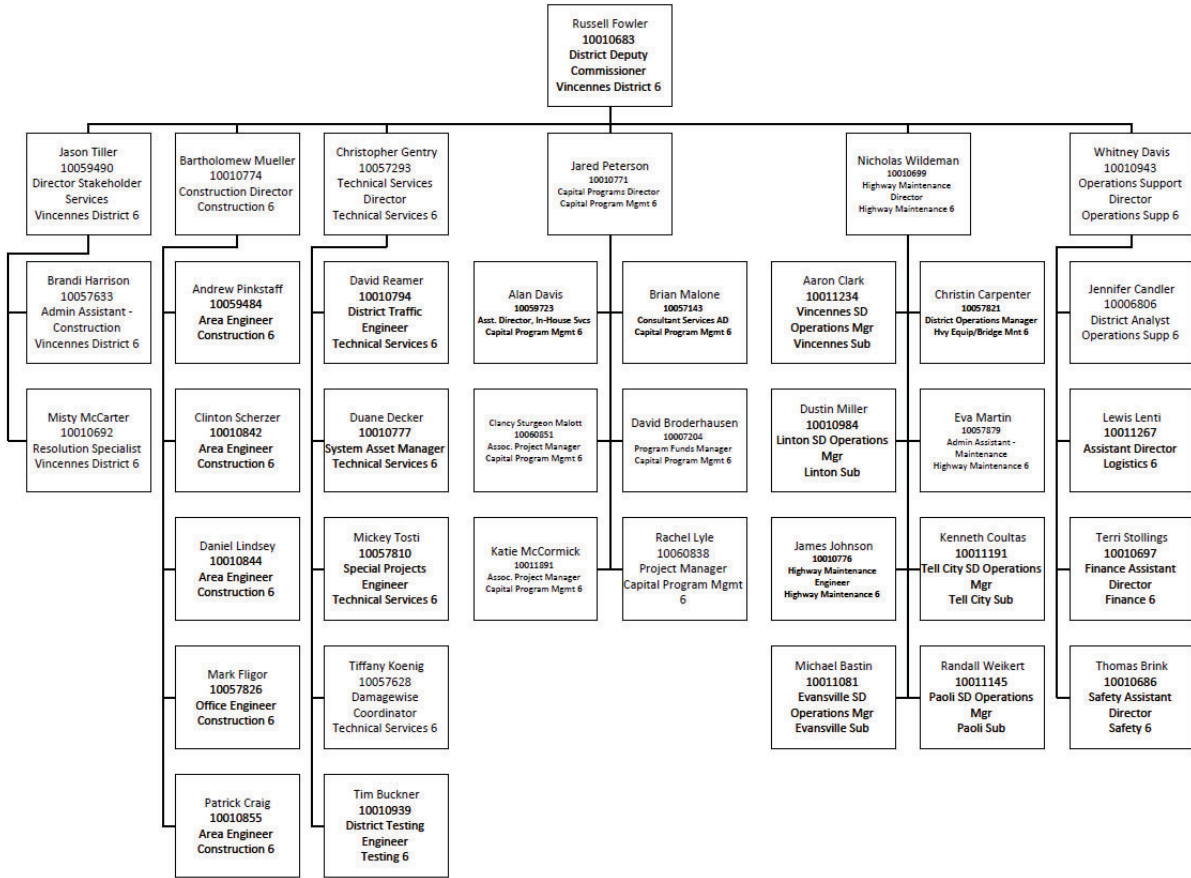


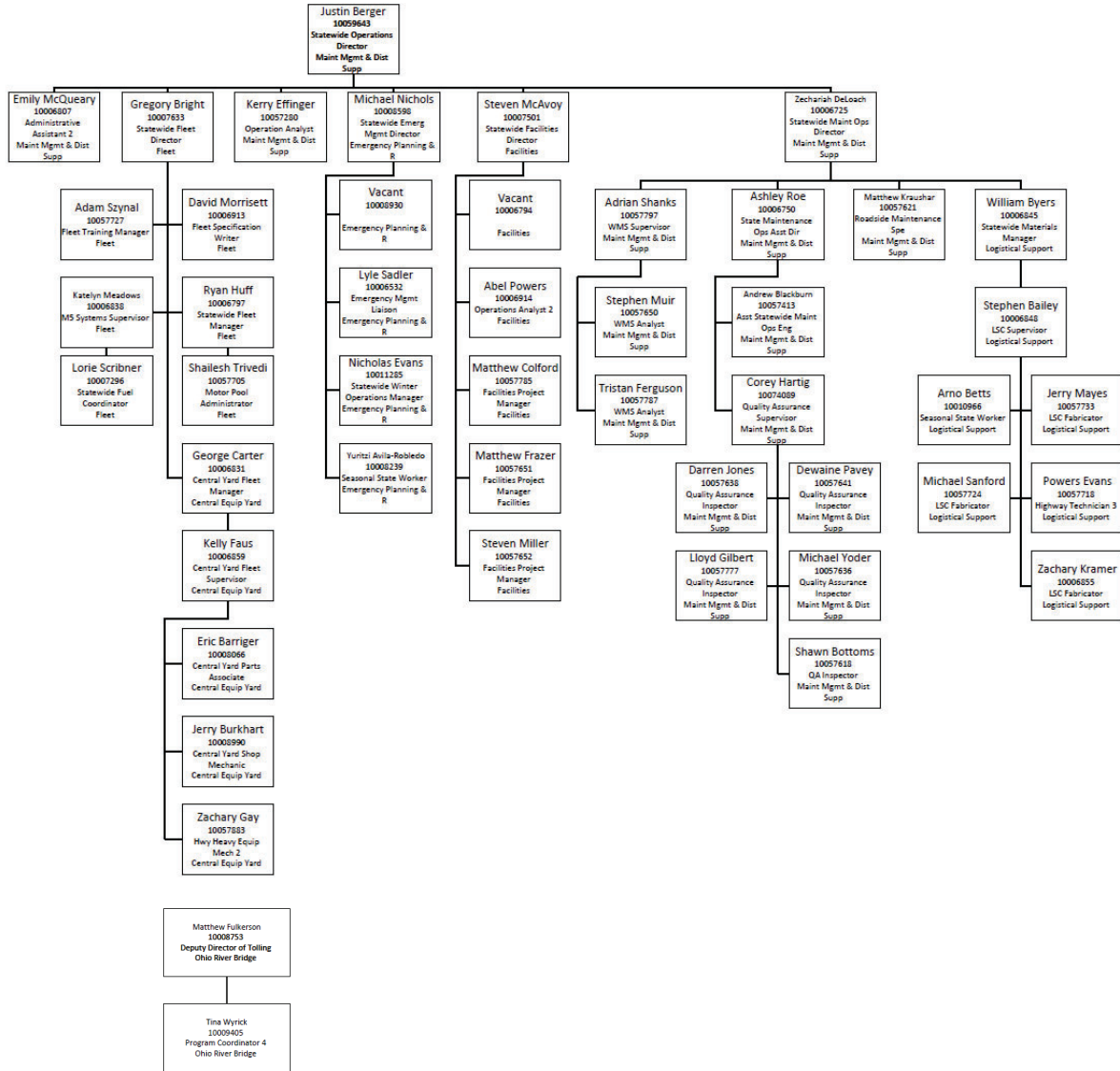


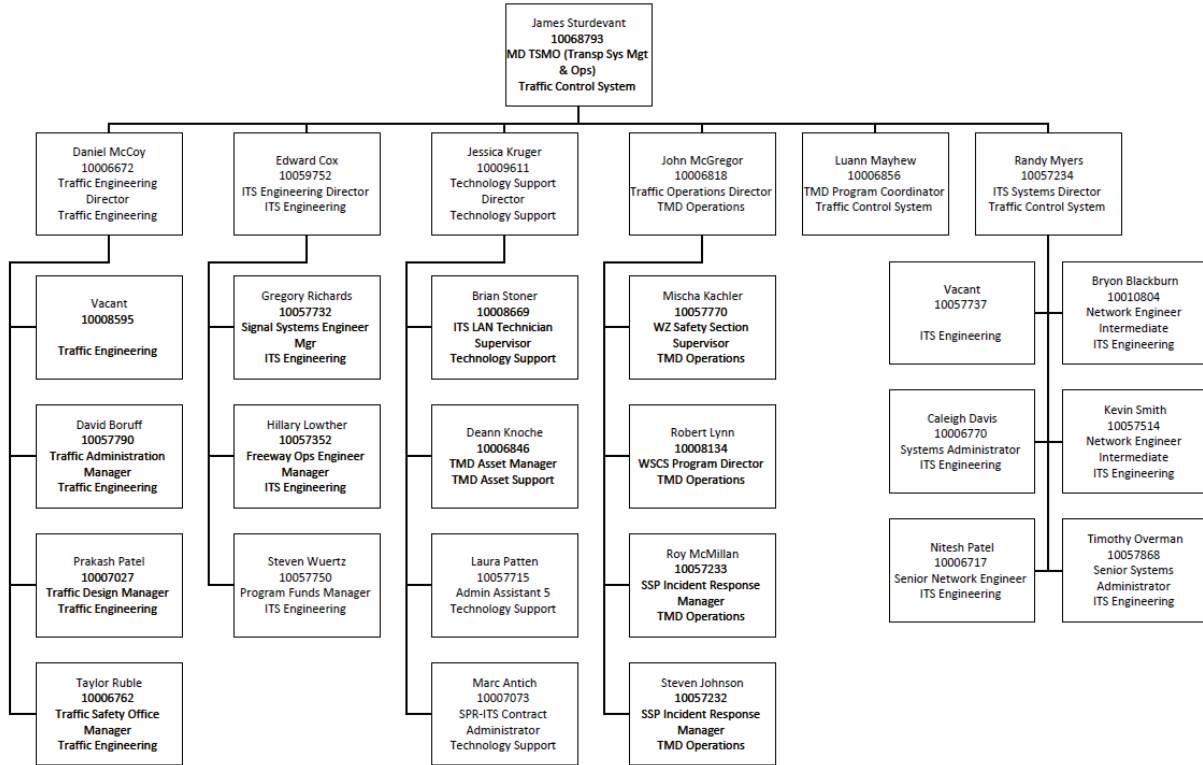




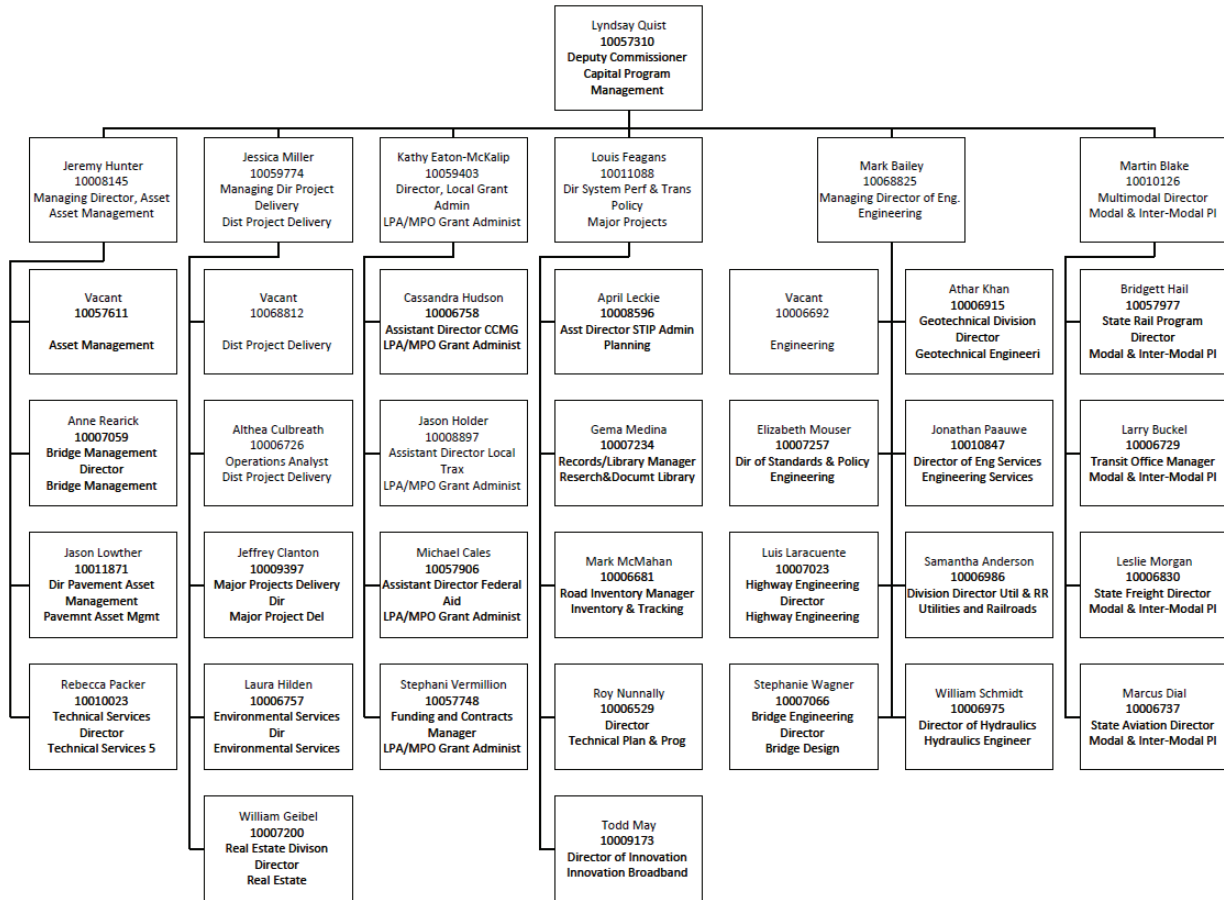




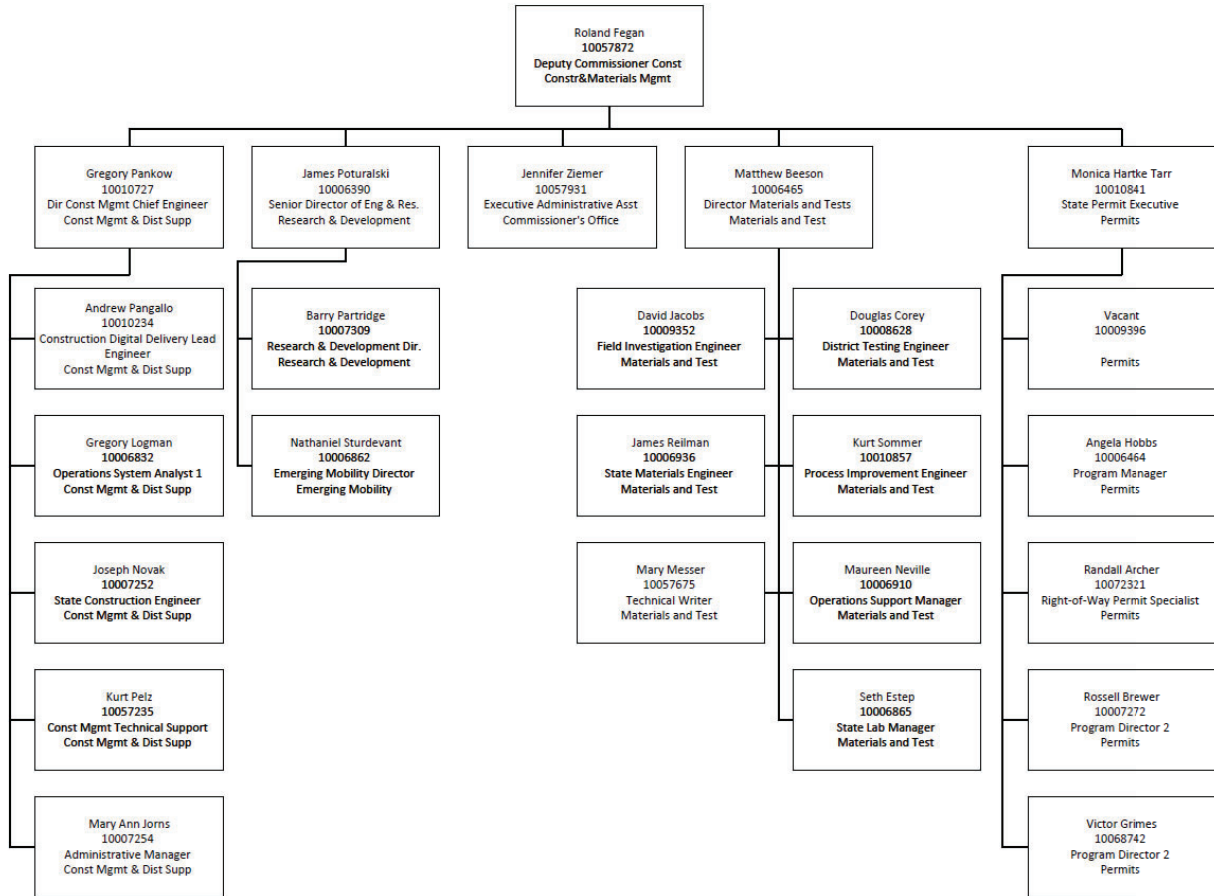




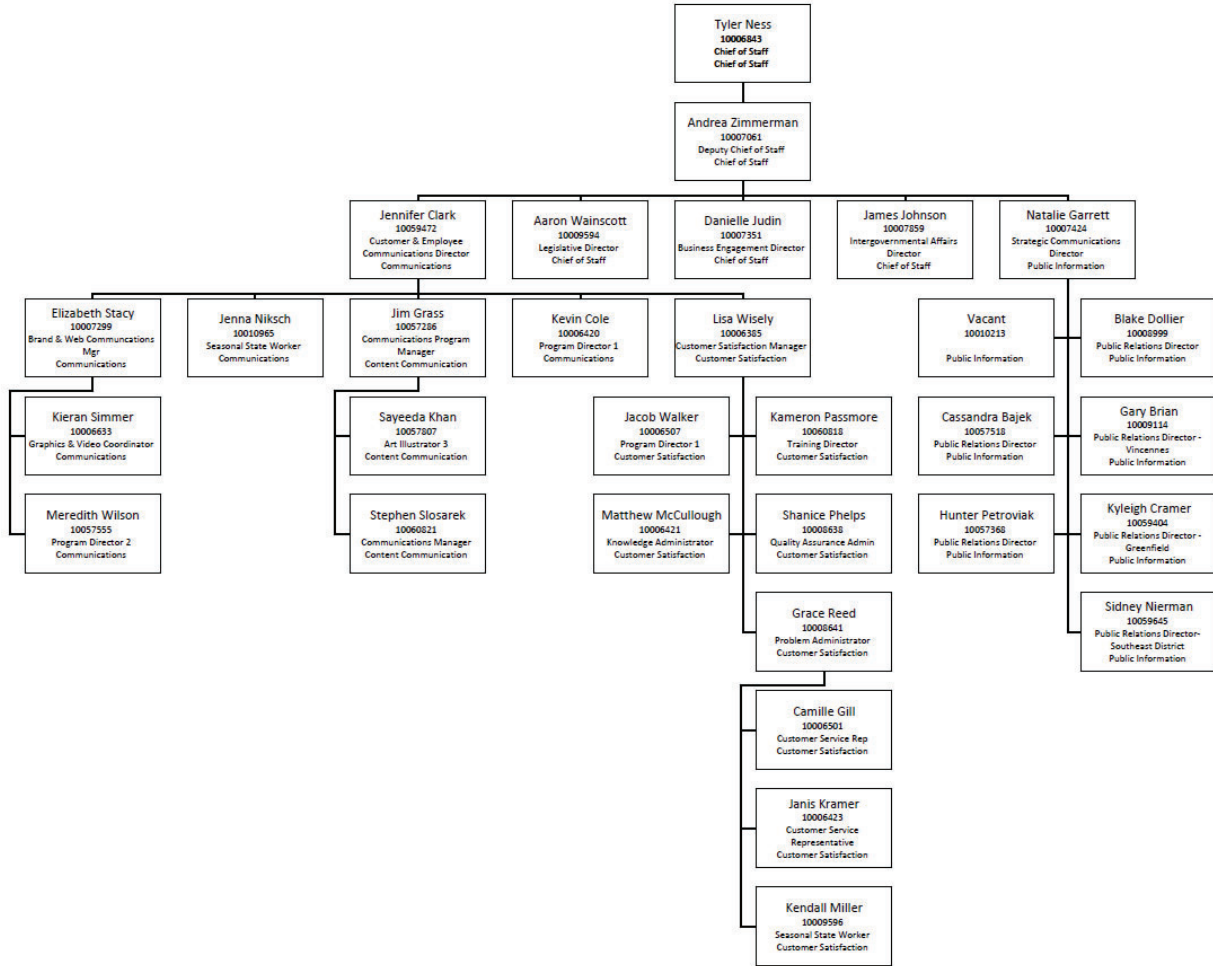
Capital Program Management



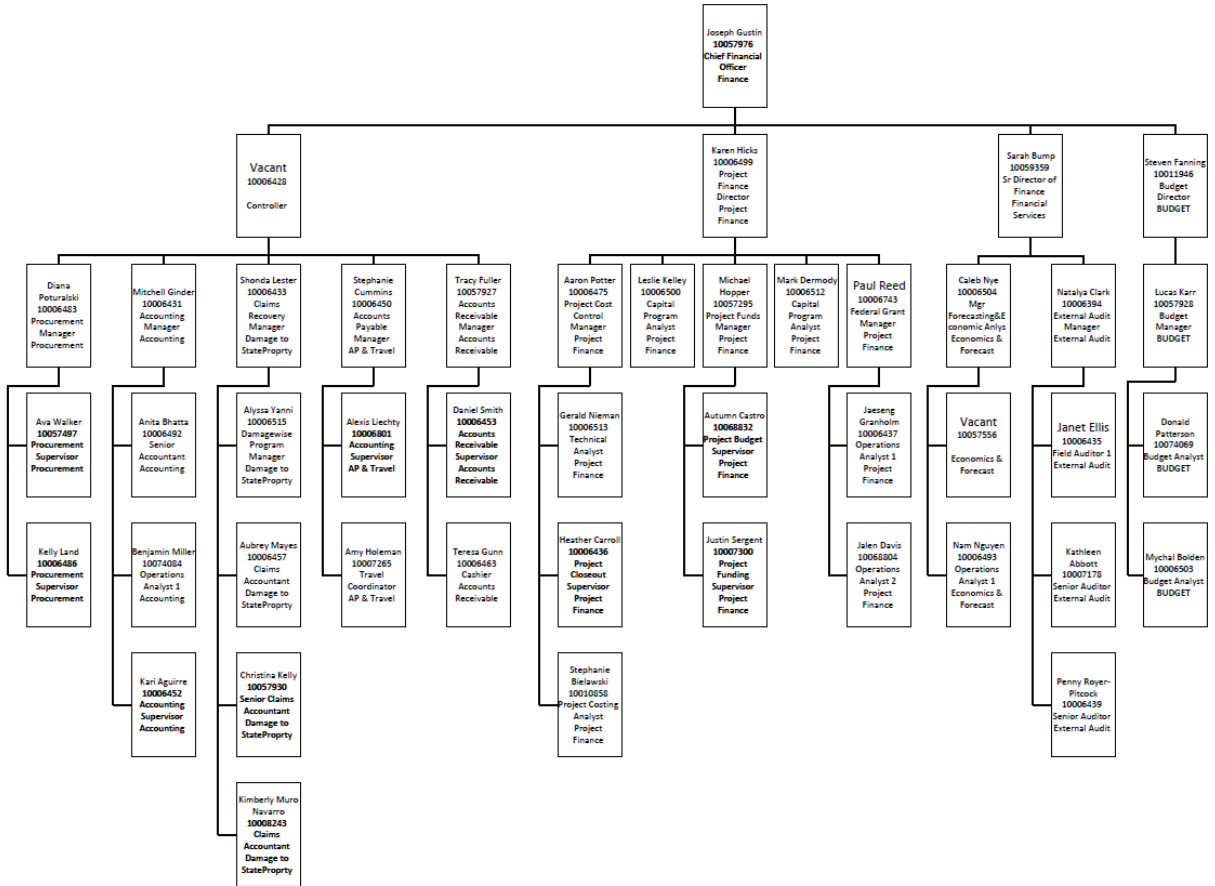
Constr & Materials Mgmt



Chief of Staff



Finance



Attachment D

Title VI Liaisons and Pars

Name	Program Area	Division	Location
Roy Nunnally	Major Projects (Liaison)	Technical Planning & Programs	Central Office
Catherine Seely	Major Projects (PAR)	Technical Planning & Programs	Central Office
April Leckie	Major Projects (Liaison)	STIP Planning	Central Office
Michael McNeil	Major Projects (PAR)	STIP Planning	Central Office
Ryan Pennington	Major Projects (PAR)	STIP Planning	Central Office
Laura Hilden	Project Delivery (Liaison)	Environmental Services	Central Office
Terri Fair	Project Delivery (PAR)	Environmental Services	Central Office
Andrew Passmore	Project Delivery (PAR)	Environmental Services	Central Office
Michael Cales	LPA/MPO Grant Administration (Liaison)	Federal Aid	Central Office
Cassandra Hudson	LPA/MPO Grant Administration (PAR)	CCMG	Central Office
Teresa Giller	Legal (Liaison)	Legal Services	Central Office
Steven Duncan	Legal (Liaison)	Contract Administration	Central Office
Joel Myers	Legal (PAR)	Contract Admin Professional Servs Contracts	Central Office
Asfahan Khan	Legal (PAR)	Contract Admin Construction Contracts	Central Office
Clinton Bryant	District 1	Highway Maintenance	Crawfordsville
Scott Chandler	District 1	Capital Program Mgmt	Crawfordsville

Bill Smith	District 1	Technical Services 1	Crawfordsville
Catherine Stinson	District 1	Operations Support	Crawfordsville
Brook Groves	District 1	Maintenance Crawfordsville Sub	Crawfordsville
Jason Kaiser	District 2	Technical Services 2	Fort Wayne
Matthew Witt	District 2	Sub District Operation	Fort Wayne
Katrise Hawkins	District 2	Contracts Administration	Fort Wayne
Joe Ortiz	District 2	Special Projects Sup	Fort Wayne
Nathan Edwards	District 2	Technical Services 2	Fort Wayne
Cherilynn Hull	District 2	Technical Services 2	Fort Wayne
James Sturdevant	Transportation System Mgt & Ops	Traffic Control System	MD TSMO
Tamara Snyder	District 3	Resources	Greenfield
Amy Groff	District 3	Capital Program Mgmt 3	Greenfield
Rob Gill	District 3	Special Projects Engineer	Greenfield
Lynette Werner	District 4	Technical Services 4	LaPorte
Steven Vanes	District 4	Technical Services 4	LaPorte
Julie Ritzler	District 4	Capital Program Mgmt 4	LaPorte
Julina Adams	District 4	Capital Program Mgmt 3	Laporte
Annie Walker	District 5	Customer Service	Seymour
Alisa Sweazy	District 5	Customer Service	Seymour
Rebecca Packer	District 5	Technical Services	Seymour

Kay Gibson	District 5	Madison Sub District	Seymour
Teresa Galyan	District 5	Bloomington Sub District	Seymour
Jason Tiller	District 6	Stakeholder Services	Vincennes
Christopher Gentry	District 6	Technical Services	Vincennes
Eva Martin	District 6	Highway Maintenance	Vincennes
Patty Farris	District 6	Linton Sub District	Vincennes

Attachment E

Sample Audit Review Questions for Capital Program Management Division

The capital program management division within INDOT develops projects following state and federal regulations to meet our transportation asset management targets and to improve safety, mobility, and economic development for the State of Indiana. Capital program management is responsible for projects from scoping through to construction.

Annual Review

Each responsible person(s) within the Department's divisions gathers and provides data to the INDOT Title VI Coordinator on or before September 30th each year. The information will be included in the required goals and accomplishment report to be submitted to the FHWA on or before November 1st, yearly.

Title VI Questionnaire- General Questions per each division

1. Do your Standard Operating Procedures (SOP) include Title VI non-discrimination policies and procedures?
2. If yes, please list all non-discrimination policies and procedures contained in your SOP.
3. Are all Title VI population groups adequately informed of planning activities regarding projects that may impact their area to allow participation and input?
4. Are public meeting notices disseminated to the public? If so, by what methods?
5. Has meaningful access to citizens who are of LEP been provided? How?
6. Did the department collect, maintain, and analyze data on race, national origin, and income level, elderly, persons with disabilities, to adequately assess impacts and mitigation options on each proposed or planned project?
7. If so, by what methods were data on race, national origin, income levels, elderly, and persons with disabilities, collected for each proposed plan?
8. Were any complaints lodged for failure to inform the public acting as a barrier to participation? If so, how were the complaints handled?
9. Were any complaints lodged for disproportionate or adverse impact of the proposed plan?
10. What economic, social, topographical, and environmental impacts were considered for planned project locations?
11. To what extent are Title IV requirements, specifically those that affect disabled citizens, included in all project designs?
12. To what extent was training provided on Title VI and LEP?

Major Project- Technical Plan & Prog → STIP

1. Please state in detail what opportunities were afforded for minority, low-income, disabled, and elderly groups to provide input on transportation projects and priorities as part of the continuing transportation planning process for the development of the STIP.

2. What measures are taken to ensure that reasonable accommodations for persons with disabilities are provided, and meaningful access for LEP persons is provided during the STIP process?
3. Were any complaints lodged for disproportionate or adverse impact on the proposed and approved STIP? If so, who handled the complaints and how were they resolved?
4. What were the Major Project team's goals & accomplishments for the year 2023? If goals were not met, what were the barriers?

Project Delivery-

Ensuring district and major project delivery is performed in a manner that meets state, and federal design requirements. Ensuring coordination between delivery stakeholders, including project management and project support services like real estate, contract administration, and environmental services. Oversight of the construction process, particularly with major projects.

1. How were consultant contracts administered in a non-discriminatory manner?
2. Was Title VI language included in all contracts?
3. Were directives and procedures reviewed to ensure Title VI compliance?
4. Were requests for proposals advertised in all segments of the community including minority publications?
5. What measures are used to ensure services are provided in a nondiscriminatory manner?
6. Were there any complaints of discriminatory practices lodged this year? If so, how many? What were the outcomes?
7. What were the Major Project team's goals & accomplishments for this year? If goals were not met, what were the barriers?

Right Of Way

Management of INDOT right of way from a legal perspective, including condemnation, relocations, secured parcels, legal responsibilities, and statutory changes. Real estate is the land we need to buy and right of way is the land we own.

1. Did the department document and report any complaints by property owners and/or those displaced? If so, to whom were the complaints reported? If known, what were the outcomes?
2. Did the department document and report any relocation appeals resulting from a claim of discrimination?
3. Were interpreters provided for landowners when required, if ever?
4. Did the department provide available replacement comparable housing to persons in compliance with Title VI and the Uniform Act? Will any reported instances of discrimination for replacement housing be documented and investigated?

5. Did the department advise affected property owners, those displaced, and others impacted by a transportation project, of their rights and benefits regarding valuation, acquisition, relocation, condemnation, and other aspects of the right-of-way process?
6. Did the department incorporate non-discriminatory language and assurance statements in all advisory materials presented to property owners and those displaced?
7. Did the department follow non-discriminatory Real Estate Procedure Manual procedures with potential buyers during the sale and licensing of INDOT property?
8. In what roles does INDOT use outside consultants in the r/w division?
9. Did department ensure vendors Title VI compliance when performing real estate appraisal activities? Acquisition activities including in condemnations?
10. Did the r/w division collect information for the Annual Title VI Report?
11. What data was collected to determine if there were Title VI impacts and/or unfair practices about r/w management?
12. Describe the methods used to capture data.
13. What methods were used to analyze the data captured?
14. Did the department use environmental justice or other baseline data regarding the project area to determine the demographics of the inhabitants before or as part of the right-of-way process? If so, how was the data used?
15. Did the department hold public meetings to advise property owners and inhabitants of the process once it was determined that the inhabitant's dwellings would be acquired?
16. If so, were voluntary demographic surveys disseminated at all public interest meetings?
17. What were the ROW team's goals & accomplishments for the year 2023? If goals were not met, what were the barriers?

Attachment F

Indiana Department of Transportation (INDOT) Title VI Program -- Pre-Award Assurance Checklist

This assurance checklist must be completed, signed, and returned to the INDOT Civil Rights Program as part of your funding process. Below are the requirements to assure non-discrimination in local public agencies (LPA) transportation projects. This checklist also serves as a preview of the processes, procedures, policies, and documentation that could be expected at a formal Title VI Review.

In order to be awarded federal financial assistance, the LPA must certify that it will provide the following information when required, and where applicable in conjunction with reporting requirements and/or a Title VI Review. This checklist also serves to document that the LPA currently has in place, or will be able to implement, where applicable, the following processes and procedures. Please note in the "Comments" column any implementation plans. **Attach a copy of your most recent Title VI Implementation Plan and ADA Transition Plan.**

Data Collection – A process to collect the following:	YES	NO	N/A	COMMENTS
Number of (INDOT) federally funded projects awarded or ongoing during the past two years.				
Log showing Title VI complaints received during past two years (number, how resolved, issues involved) if any.				
Attendance at public hearings tracked, broken down by race, color, national origin, and gender.				
Statistical data collected on race, color, nation origin, and disability for communities impacted by construction projects.				
Statistical data collected on race, color, national origin and disability for all right-of-way relocatees. (Not Applicable for Transit Providers)				
Staffing:	YES	NO	N/A	COMMENTS
Staff designated to have Title VI coordination responsibilities (in conjunction with other duties).				
Policies, Procedures, Processes:	YES	NO	N/A	COMMENTS
Title VI Policy or Policy Statement in place for your organization, signed by the Sponsor.				
Proof of public dissemination of Title VI Policy or Policy Statement.				
Process for handling Title VI complaints from the public.				
Proof of public dissemination of complaint procedure.				
Planning, public involvement guidelines, and public involvement policies reviewed for compliance with Title VI.				
Title VI Implementation Plan and ADA Transition Plan with proof of public dissemination methods, website, publications, etc.				
Training:	YES	NO	N/A	COMMENTS
Has staff received any Title VI training (formal or informal).*				
Contracts & Agreements:	YES	NO	N/A	COMMENTS
LPA-issued contracts/agreements contain Title VI non-discrimination assurances.				

Planning Activities – Documentation to show (if not performed by INDOT):	YES	NO	N/A	COMMENTS
Minority members of the community are actively sought out to participate in public hearings				
Accessible locations, adequate notice, and language translation services are considered or provided during the coordination of public hearings.				
The project for which funding is sought complies in all aspects with the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973.				
Design/Environmental Activities – Documentation to show (if not performed by INDOT):	YES	NO	N/A	COMMENTS
Minority members of the community are actively sought out to participate in public hearings.				
Accessible locations, adequate notice, and language translations services are considered or provided during the coordination of public hearings				
Location and design manuals, directives, operational procedures, guidelines and policies reviewed for Title VI compliance.				
Right of Way Activities – Documentation to show (if not performed by INDOT):	YES	NO	N/A	COMMENTS
Title VI language incorporated in all acquisition, negotiation, property management communications and contracts.				
Title VI language and assurance statements included in all surveys for property owners and tenants after conclusion of all business.				
Values and communications associated with appraisals conducted in an equitable and nondiscriminatory manner.				
Deeds, permits, and leases contain Title VI compliance clauses.				
Construction & Maintenance Activities – Documentation to show (if not performed by INDOT):	YES	NO	N/A	COMMENTS
Contractor selection procedures have been reviewed to ensure uniformity in their application to minority and non-minority contractors.				
Minority contractors and subcontractors are informed about contracting opportunities with the LPA.				
Title VI assurances included in all LPA-issued contracts, subcontracts, and material supply agreements.				

Must return a copy of this completed form via email to:

Taffanee Keys, Civil Rights Counsel
Indiana Department of Transportation
(INDOT), email: tkeys@indot.in.gov

Local Public Agency Name/Phone Number

Signature of duly authorized representative for LPA

Title

Date

*Title VI training can be provided by the INDOT upon request. To discuss training or Title VI requirements, reviews, or reports, contact Taffanee Keys, Civil Rights Counsel, tkeys@indot.in.gov or 317-941-4512

[Letterhead]

[date]

Taffanee Keys
Subrecipient Compliance Auditor
Indiana Department of Transportation
Indiana Government Center North, Room 758
100 N. Senate Ave.
Indianapolis, IN 46204

RE: [name of community]’s Nondiscrimination & Accessibility Letter of Commitment to INDOT

Ms. Keys;

[Community] is submitting this correspondence to INDOT as a good faith representation that it intends to improve its compliance with those nondiscrimination & accessibility requirements which are conditions of receiving federal funds. INDOT has reviewed [community]’s compliance efforts and identified the following potential deficiencies:

[List deficiencies identified or attach list and reference attachment here]

[list potential deficiency identified by INDOT]	[list item enclosed that demonstrates compliance]
e.g. Community does not have an ADA Transition Plan.	e.g. Copy of Communities transition plan is enclosed.

[Community] has enclosed documents in evidence that [community] is in compliance with the following:

[Community] commits to address the remaining deficiencies (if any) as follows:

- I. [identify first deficiency] (e.g. Community does not have a Title VI Implementation Plan.)
 - a. [Community] plans to address this deficiency by [date].
 - b. In 2016 [Community] plans to take the following steps toward resolving this deficiency:
 - i. By [Month / Date] [Community] will (e.g. identify program areas with Title VI Implications)
 - ii. By [Month / Date] [Community] will (e.g. review existing policies for incorporation or reference into the Title VI Implementation Plan)
- iii. [identify next action step]

- II. [identify next deficiency}

[Community] represents that the above representations are made in good faith and represent its commitment toward achieving compliance with all nondiscrimination and accessibility requirements. [Community] represents that the undersigned individual is authorized to make these commitments on behalf of [Community] and understands that INDOT may monitor [Community]’s progress toward achieving its goals as represented herein.

This letter of Commitment is being submitted by:

[name] [Title / role]
[address]
[email]
[phone]
[fax]

Sincerely,
[Name]



Demographics Form

Thank you for taking a few minutes to complete this survey. **Answering the following questions is optional** but your response will be extremely helpful in ensuring the fairness and equity of INDOT's public involvement process. Submissions will be kept confidential and separate from any personally identifiable information so that respondents will remain anonymous. These questions are not listed in any particular order.

What is your race?

- Black or African American
 American Indian or Alaskan Native
 Asian
 Hispanic or Latino
 White
 Native Hawaiian or Other Pacific Islander
 Prefer to self-describe: _____

What is the primary language spoken in your home?

- English
 Spanish
 Other (Please specify): _____

Was the project information translated into other languages appropriately?

- Yes
 No
 Not Applicable

How many people live in your household?

- 1 - 2
 3 - 5
 6 +

What are the age ranges of those living in your household? (Check all that apply.)

- Under 18
 19 - 44
 45 - 64
 65 +

What is your annual household income?

- Less than \$10,000
 \$10,000 - \$24,999
 \$25,000 - \$49,999
 \$50,000 - \$74,999
 \$75,000 - \$99,999
 \$100,000 - \$149,999
 \$150,000 +

What is the highest level of education completed by members of your household?

- None
 Elementary school
 Middle school
 High school
 College/university
 Graduate degree
 Other (Please specify): _____

Do any individuals living in your home have a physical or mental impairment which substantially limits one or more major life activities?

- Yes
 No
 Prefer not to answer

Please suggest additional ways you think INDOT can improve inclusiveness of our public outreach efforts:

Thank you for helping INDOT improve
its public involvement practices!

Please submit this page only:
 Email insert_email@indot.IN.gov or mail to:
 Attn: Public Involvement
 Indiana Department of Transportation
 100 N Senate Ave.
 Indianapolis, IN 46204

EXTERNAL COMPLAINT OF DISCRIMINATIONINDIANA DEPARTMENT OF TRANSPORTATION
PREQUALIFICATION & COMPLIANCE DIVISION
Taffanee Keys, ADA/Title VI Program Manager
INDIANA DEPARTMENT OF TRANSPORTATION
Prequalification & Compliance Division

100 N Senate Ave. Room N758-PQ

Indianapolis, IN 46204

Telephone number: (317) 941-4512

E-mail address: AccessForAll@INDOT.in.gov**INSTRUCTIONS:**

The purpose of this form is to help any person interested in filing a discrimination complaint with the Indiana Department of Transportation (INDOT). If the complaint is against INDOT, INDOT's Title VI/ADA Program Manager will forward it to the appropriate federal agency for investigation.

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 printed above.

All items in bold 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, and national origin in connection with programs or activities receiving federal financial assistance from the United States Department of Transportation, Federal Highway Administration and/or Federal Transit Administration. These prohibitions extend to INDOT as a direct recipient of federal financial assistance and to its sub-recipients, consultants, and contractors, whether federally funded or not.

INDOT is also required to implement measures to ensure that persons with limited English proficiency and persons with disabilities have meaningful access to the services, benefits, and information of all its programs and activities under Executive Order 13166, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, as amended.

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. For TTY customers, dial 711 to reach the Indiana Relay Service.

You also have the right to file a complaint with other state or federal agencies that provide federal financial assistance to INDOT. Additionally, you have a right to seek private counsel.

INDOT and its sub-recipients, consultants, and contractors are 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.

Please make a copy of your complaint form for your 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 above.

Complaints of discrimination must be filed within 180 days of the date of the alleged discriminatory act. If the alleged act of discrimination occurred more than 180 days ago, please explain your delay in filing this complaint.

****Your complaint cannot be processed without your signature.**

COMPLAINANT INFORMATION

Name (first, middle, and last)

Address (number and street, city, state, and ZIP code)

Home telephone number

() -

Work telephone number

() -

Cellular telephone number

() -

Available in an alternative format upon request.

Email Address:

	Date (month, day, year)
--	-------------------------

WHO DO YOU ALLEGE WAS THE VICTIM OF DISCRIMINATION

You

A Third-Party Individual

A Class of Persons

PERSON / AGENCY YOU BELIEVE ENGAGED IN DISCRIMINATED

Name (first, middle, and last)	Title
--------------------------------	-------

Name of company

Address (number and street, city, state, and ZIP code)

Home telephone number () -	Work telephone number () -	Cellular telephone number () -
--------------------------------	--------------------------------	------------------------------------

When was the last alleged discriminatory act? (month, day, year)

Do you consent to the investigator sharing your name and other personal information with other parties to this matter when doing so will assist in investigating and resolving your complaint? Yes No

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:

The alleged discrimination was based on:

Race

Color

National Origin

Disability

Retaliation

Have you filed this complaint with any other agency (Federal, State, or Local)? Yes No

If yes, please identify: _____

Have you filed a lawsuit regarding this complaint? Yes No If yes, please provide a copy of the complaint.

Describe the alleged act(s) of discrimination. *You should include specific details such as names, dates, times, witnesses, and any other information that would assist us in our investigation of your allegations. Please include any other documentation that is relevant to this complaint. (You may attach additional pages to explain your complaint.)*

Signature: _____

Date: _____

Mail form to: Title VI Manager, Civil Rights Counsel
INDOT Prequalification & Compliance
100 N Senate Ave. Room N758-PQ
Indianapolis, IN 46204

Email form to: AccessForAll@INDOT.in.gov

Available in an alternative format upon request.

Attachment J

Local Public Agency Title VI Program Implementation Plan Checklist	Yes	No	Comments
1. <u>POLICY STATEMENT:</u> Does the Plan have a Title VI Program Policy Statement signed by the CEO?			
2. <u>STANDARD DOT ASSURANCES:</u> Does the Plan include a signed copy of the DOT Standard Title VI Assurances with Appendices "A," "B," "C," "D," and "E"?			
3. <u>ORGANIZATION & STAFFING:</u> Does the Plan identify the Title VI Coordinator who has easy access to the head of the agency? Is there an organizational chart that identifies the Title VI Coordinator , and their placement in the agency?			
4. <u>PROGRAM REVIEW PROCEDURES:</u> Does the Plan describe the nature of the recipient's program areas and include procedures for conducting reviews of pertinent program areas?			
5. <u>SPECIAL EMPHASIS PROGRAM AREAS:</u> Does the Plan describe the process the LPA uses to identify their special emphasis program areas and how they address identified trends or patterns of discrimination in those areas?			
6. <u>SUB-RECIPIENT REVIEW PROCEDURES:</u> Does the Plan describe the process for conducting reviews of sub recipients, (consultants, vendors, contractors, etc.)?			
7. <u>DATA COLLECTION/REPORTING/ANALYSIS:</u> Does the Plan contain a process for collecting and reporting Title VI data (race, color, national origin, sex, age, disability...)?			
8. <u>TITLE VI TRAINING:</u> Does the Plan address Title VI training of staff members and sub recipients?			
9. <u>COMPLAINT PROCEDURES:</u> Does the Plan contain complaint procedures which describe a prompt process for investigations and disposition of Title VI complaints?			
10. <u>DISSEMINATION OF TITLE VI INFORMATION:</u> Does the Plan contain community outreach and public education procedures (making the public aware of their rights under Title VI program authorities)?			
11. <u>LIMITED ENGLISH PROFICIENCY (LEP):</u> Does the Plan communicate how the LPA implements the Title VI Program requirements of Limited English Proficiency (LEP)?			

<p>12. <u>ENVIRONMENTAL JUSTICE (EJ)</u>: Does the Plan communicate how the LPA implements the Title VI Program requirements of Environmental Justice to include a public participation plan and outreach plan?</p>				
<p>13. <u>REVIEW OF LOCAL CITY/COUNTY DIRECTIVES</u>: Does the Plan describe how the LPA reviews directives to determine if there are Title VI implications, and interpret how directives impact Title VI program areas?</p>				
<p>14. <u>COMPLIANCE AND ENFORCEMENT PROCEDURES</u>: Does the Plan outline Title VI Program compliance and enforcement procedures to eliminate and address discrimination, resolve deficiencies, etc. when noncompliance occurs?</p>				



Limited English Proficiency Plan

I Speak...

廣東
普通话
Tiếng Việt
Español العربية
Tagalog မာသာဝာဝ
Deutsch 한국어
Polski Français
Русский 日本語
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Ensuring Meaningful Access for
Limited English Proficient Individuals

October 1, 2024

(Fiscal Year 2025)

Taffanee Keys
Attorney Senior (Civil Rights Counsel)
Prequalification – Policy & Compliance
Indiana Government Center North
100 N. Senate Ave., Room N758-PQ
Indianapolis, IN 46204
tkeys@indot.in.gov

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I. INTRODUCTION

INDOT is committed to ensuring that all persons having language barriers are made equal participants early in the development stages and throughout the life of INDOT's programs, projects, services, or activities, and that the public and communities the department serve are allowed to provide input for those projects or plans that may have an impact on their wellbeing. It is INDOT's intent to ensure fairness, equal opportunity, inclusion, and access by actively seeking input from persons who do not speak English, or have difficulty communicating in English, regarding quality-of-life issues that directly affect them.

This Limited English Proficiency (LEP) Plan, in keeping with Executive Order (EO) 13166, has been designed to provide guidance to INDOT employees for meeting the needs of individuals with limited English proficiency and all beneficiaries of transportation programs.

What does it mean to be Limited English Proficient (LEP)?

LEP individuals do not speak English as their primary language and therefore have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information in English.

Background

Title VI & Executive Order 13166

Title VI of the federal Civil Rights Act of 1964 (Title VI), which prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance. National origin discrimination includes discrimination based on a person's inability to speak, read, write, or understand English. Recipients of Federal funds must provide meaningful access to LEP individuals.

Executive Order 13166

On August 11, 2000, President Bill Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency". The Executive Order requires federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP) and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will

provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries

II. PURPOSE of the PLAN, EFFECTIVE STRATEGY and POLICY

INDOT has developed its' LEP Plan to eliminate or reduce barriers while providing guidance on how to access and fulfill INDOT's commitment to ensure Indiana citizens have safe, timely, and meaningful access to its programs and services. For the purposes of this plan, only those individuals who were identified in the 2021 U.S. Census American Community Survey, C16001 Language Spoken at Home for the Population 5 Years and Over as having the ability to speak English less than "very well" are being considered. INDOT's LEP Plan addresses these elements to aid in identifying LEP persons so that they are provided meaningful access to INDOT services and activities that may affect their quality of life. These elements include the following.

1. Identifying LEP persons who need language assistance.

The State Transportation Improvement Plan (STIP) will provide the program and project-level basis for determining the need for public involvement and public engagement. Impacts to communities should be recognized early and monitored continually throughout the transportation decision-making process. One method for this is through enhanced public outreach and participation methods at all points of the statewide transportation planning process ensuring meaningful participation by citizens, including traditionally underserved communities. The integration of environmental justice principles into the transportation planning process is consistent across all areas of INDOT. INDOT has contracted with a consulting firm, to develop an analysis used to target underserved communities and vulnerable populations. INDOT intends to have its' Project Equity Scoring Tool in place by year 2024. .

The analysis provides demographic and socioeconomic profiles of each INDOT district, subdistrict, and metropolitan planning area that will be used to ensure targeted outreach opportunities to these identified community areas. The analysis includes information on LEP areas, population demographics, education, income, transportation access, and related information critical for targeted outreach.

2. Identify ways in which language assistance will be provided.

INDOT will provide oral and written translation, written interpretation, and translation, and

sign language, if requested or as a result of an LEP analysis on any given project or projected program, requiring translation or interpretation. In addition, video visualization techniques will be used to illustrate INDOT projects as called for in INDOT's Public Involvement Plan.

INDOT will evaluate its programs, services, and activities where LEP persons are likely to be encountered or when projects may impact an LEP population. An annual survey of its employees will be conducted to determine the frequency of contact with LEP persons.

3. Training staff and others.

All INDOT staff will receive training, especially those involved in public outreach and public involvement, on identifying LEP populations and providing LEP translation and interpretation.

Sub-recipients and MPOs must provide LEP services to be in compliance with Title VI and EO 13166. Sub-recipient reviews will be conducted to ensure compliance with EO 13166. Contractor compliance reviews will include a provision to comply with the order.

4. Provide notice to LEP persons.

After LEP populations have been identified, strategies will be developed to provide notice of a program, service, or activity, using appropriate media, including brochures (also in languages other than English). Community groups serving LEP populations will be contacted, as well as schools, church groups, chambers of commerce, and other relevant entities.

III. FOUR-FACTOR ANALYSIS

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by INDOT;
2. The frequency with which LEP persons come into contact with INDOT services and programs;
3. The nature and importance of INDOT's services and programs in people's lives; and
4. The resources available to INDOT for LEP outreach, as well as the costs associated with that outreach.

Factor #1 – The number or portion of LEP Persons served or encountered in the eligible service population.

Based on data from the U.S. Census Bureau C16001 Language Spoken at Home for The Population 5 Years and Over, Indiana’s total estimated population is 6,335,798 of which 5,768,984 speak only English. Other languages reported spoken in Indiana are as follows.

Language Spoken at Home	Total Citizens Speak Language other than English	# Citizens Speak English Very Well	# Citizens Speak English Less than Very Well
Spanish	295,350	185,627	109,723
French, Haitian, or Cajun	16,009	10,282	5,727
German or other West Germanic languages	63,094	47,353	15,741
Russian, Polish, or other Slavic languages:	17,277	12,212	5,065
Other Indo-European languages:	44,111	33,015	11,096
Korean:	7,364	4,387	2,977
Chinese (incl. Mandarin, Cantonese):	25,529	14,039	11,490
Vietnamese:	7,289	3,043	4,246
Tagalog (incl. Filipino):	9,420	6,810	2,610
Other Asian and Pacific Island languages:	46,724	24,886	21,838
Arabic:	12,931	7,980	4,951
Other and unspecified languages:	21,716	16,304	5,412

The U.S. Census data shows Indiana citizens that speak Spanish very well are 187,627, and less than very well are 109,723 which totals 295,350. Spanish speakers comprise the largest non-English speaking language group, which is 4.66% of Indiana’s total population. Spanish speakers less than very well represented 1.73% of Indiana’s total population. The tables listed in the “Data by the Districts” section herein shows a breakdown of Indiana’s population by language speaking ability and demonstrates the need to ensure that LEP persons are included in the transportation public involvement process. INDOT focused its analysis on Spanish Speaking group as Spanish Speakers represents the largest number of non-English speaking language group. Please note however, INDOT makes language assistance available to all LEP speaking individuals where the need is presented.

The Safe Harbor Provision

The U.S. Department of Transportation (U.S.DOT) has adopted the U.S. Department of Justice’s Safe Harbor Provision. This provision outlines circumstances that can provide a “safe harbor” for U.S.DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for each LEP group that constitutes 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is considered strong evidence of compliance with the recipient’s written translation obligations.

The Safe Harbor Provision only applies to the translation of written documents. It does not affect INDOT's requirement to provide meaningful access to LEP individuals through oral language services. A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. See FHWA guidance below:

Table 1

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

https://www.fhwa.dot.gov/civilrights/programs/title_vi/lep_fourfactor.cfm

Data by the Districts

INDOT has six districts for the purpose of organizing and managing highway construction, maintenance, traffic, development, and testing. The six districts are Crawfordsville, Fort Wayne, Greenfield, LaPorte, Seymour, and Vincennes. Indiana has 92 counties which are divided amongst the six districts.

Crawfordsville District: Contains 14 counties (Benton, Boone, Clay, Clinton, Fountain, Hendricks, Montgomery, Owen, Parke, Putnam, Tippecanoe, Vermillion, Vigo and Warren)

Fort Wayne District: Contains 14 counties (Adams, Allen, DeKalb, Elkhart, Grant, Huntington, Kosciusko, LaGrange, Miami, Noble, Steuben, Wabash, Wells, Whitley.

Greenfield District: Contains 16 counties (Blackford, Delaware, Fayette, Hamilton, Hancock, Henry, Howard, Jay, Madison, Marion, Randolph, Rush, Shelby, Tipton, Union and Wayne)

LaPorte District: Contains 13 counties (Carroll, Cass, Fulton, Jasper, Lake, LaPorte, Marshall, Newton, Porter, Pulaski, St. Joseph, Starke and White) in this northwest Indiana district.

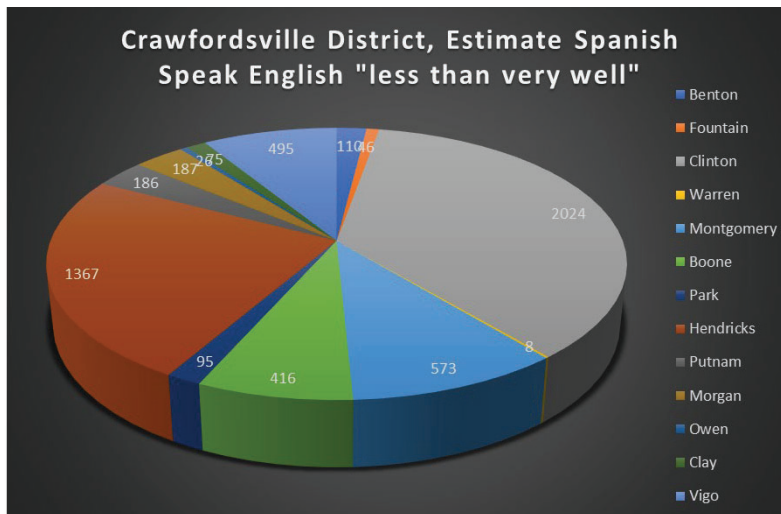
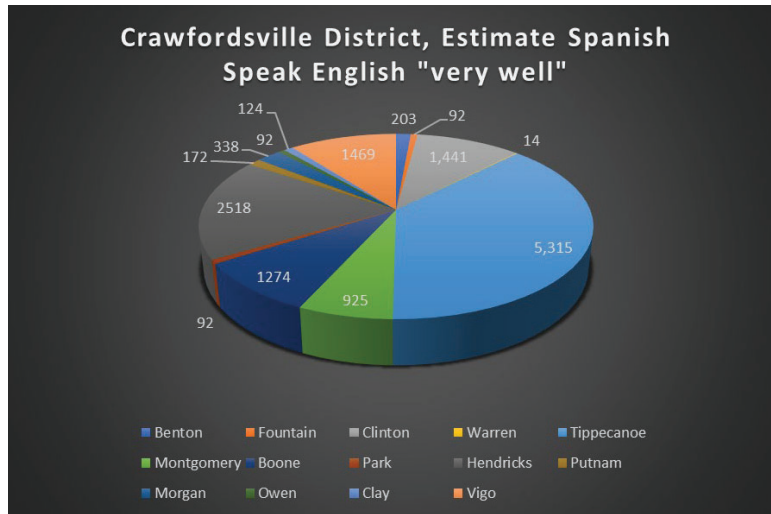
Seymour District: Contains 19 counties (Bartholomew, Brown, Clark, Dearborn, Decatur, Floyd, Franklin, Harrison, Jackson, Jefferson, Jennings, Johnson, Monroe, Morgan, Ohio, Ripley, Scott, Switzerland and Washington

Vincennes District: Contains 16 counties (Crawford, Daviess, Dubois, Gibson, Greene, Knox, Lawrence, Martin, Orange, Perry, Pike, Posey, Spencer, Sullivan, Vanderburgh and Warrick)



Data from US Census Bureau C16001 Language Spoken at Home for the Population 5 years and Over are depicted in the following Charts which shows the LEP breakdown of Spanish Speaking population per county, per each district.

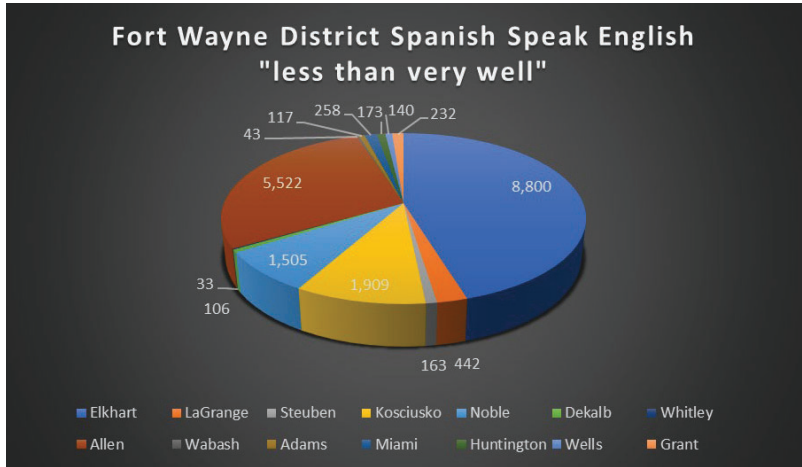
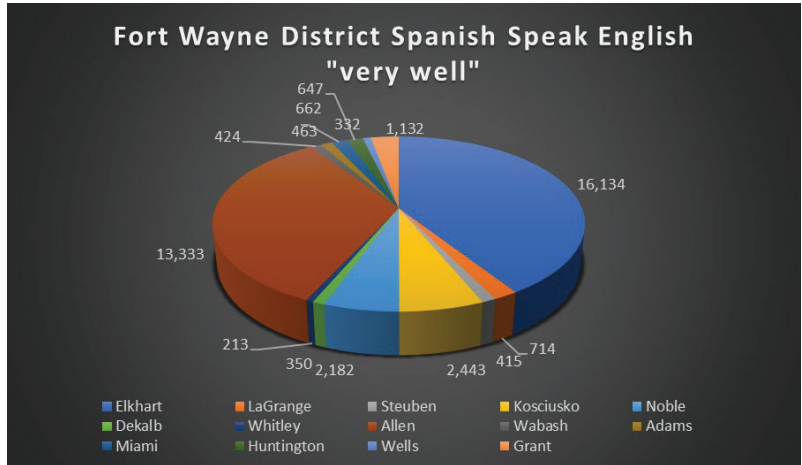
CRAWFORDSVILLE DISTRICT



County	Total Residents	Percentage "less than very well"
Benton	8,115	1.35%
Boone	65,326	.64%
Clay	24,794	.30%
Clinton	30,730	6.59%
Fountain	15,464	.29%
Hendricks	162,483	.84%
Montgomery	35,673	1.61%
Owen	20,098	.13%
Parke	15,354	.62%
Putnam	35,043	.53%
Tippecanoe	175,399	2.01%
Vigo	100,614	.49%
Vermillion	14,699	.46%
Warren	8,003	.10%

[American Community Survey C16001](#)

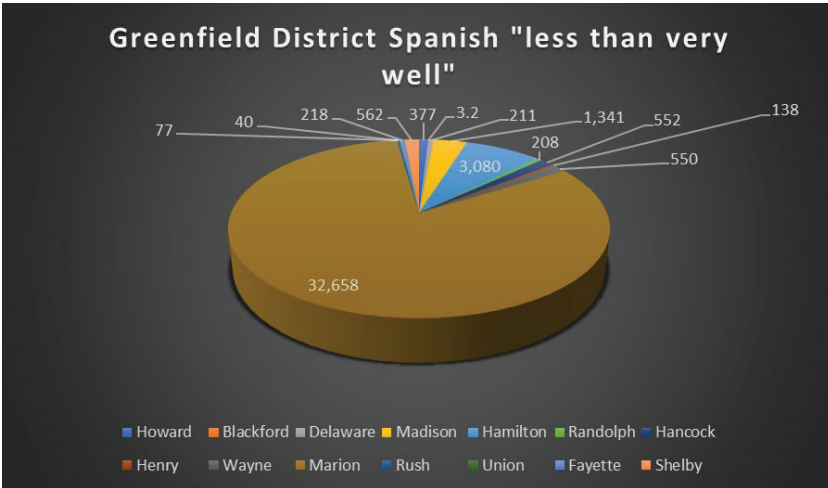
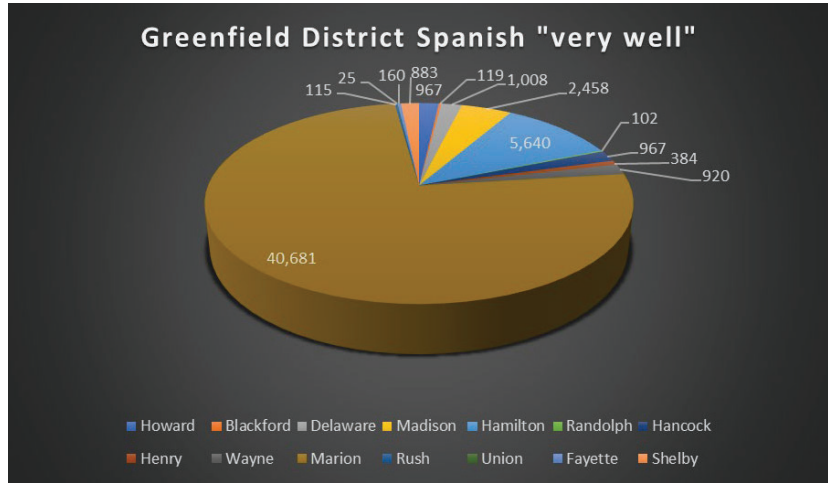
FORTWAYNE DISTRICT



American Community Survey C16001

County	Total Residents	Percentage "less than very well"
Adams	32,427	.36%
Allen	355,363	1.56%
Dekalb	40,303	.26%
Elkhart	40,594	2.94%
Grant	63,061	.37%
Huntington	34,520	.50%
Kosciusko	75,111	2.54%
LaGrange	36,483	1.21%
Miami	34,162	.76%
Noble	44,260	3.40%
Steuben	32,550	.50%
Wabash	29,509	.16%
Wells	26,366	.53%
Whitley	31,898	.10%

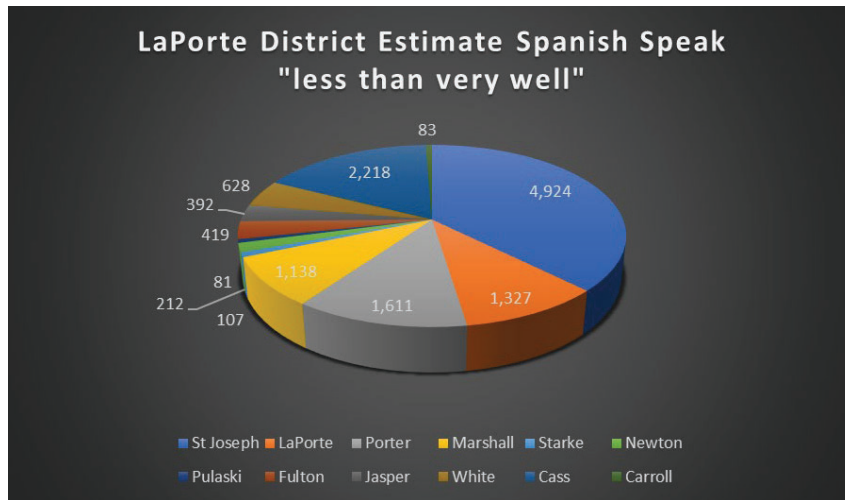
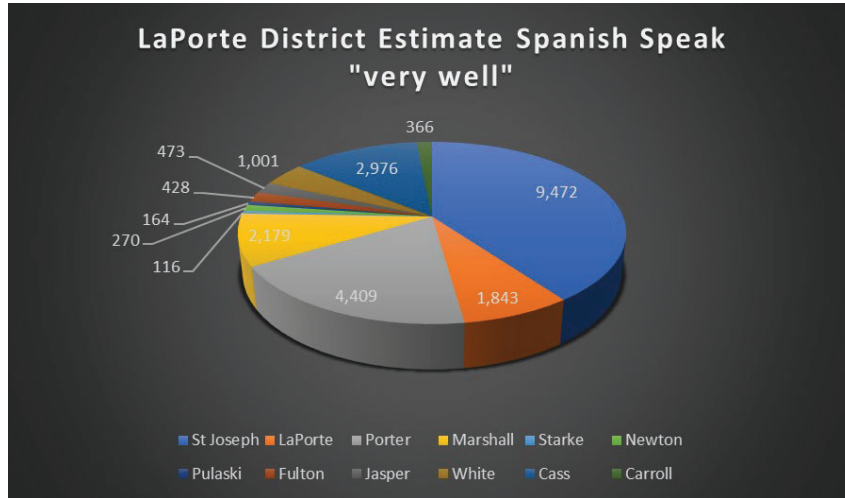
GREENFIELD DISTRICT



County	Total Residents	Percentage "less than very well"
Blackford	11,520	.26%
Delaware	106,993	.20%
Fayette	22,140	.98%
Hamilton	320,238	.96%
Hancock	74,072	.75%
Henry	46,403	.30%
Howard	78,350	.51%
Jay	19,171	.31%
Madison	122,926	1.10%
Marion	900,462	3.63%
Randolph	23,168	.90%
Rush	15,779	.49%
Shelby	42,292	1.33%
Tipton	14,438	.13%
Union	6,654	.60%
Wayne	62,719	88%

[American Community Survey C16001](#)

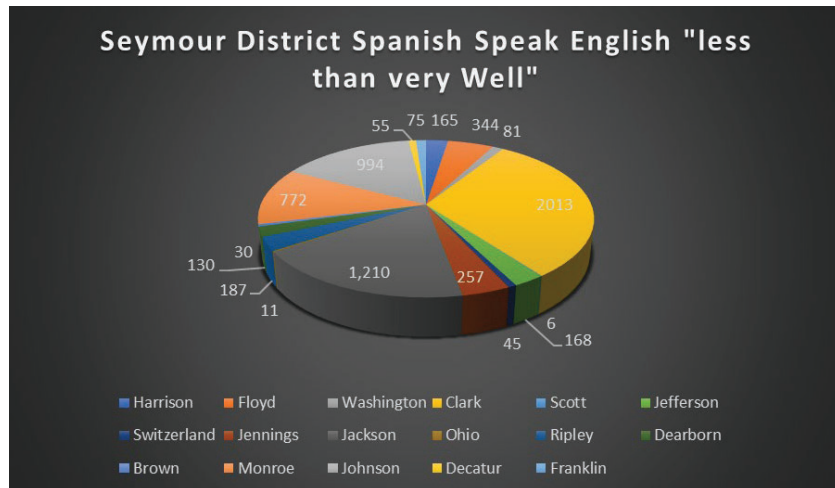
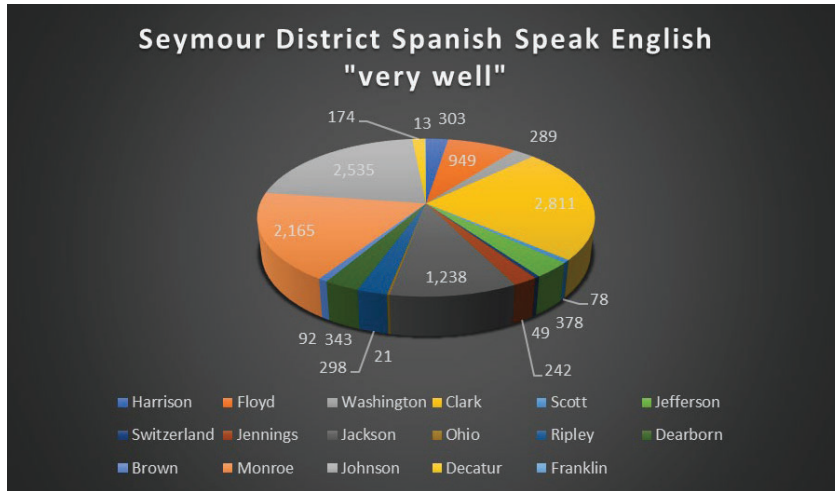
LAPORTE DISTRICT



County	Total Residents	Percentage "less than very well"
Carroll	19,185	.43%
Cass	35,714	6.21%
Fulton	19,178	2.18%
Jasper	31,163	1.26%
Lake	466,670	3.36%
LaPorte	105,750	1.25%
Marshall	43,279	2.62%
Newton	13,104	1.62%
Porter	163,259	.99%
Pulaski	11,835	.68%
St. Joesph	254,803	1.93%
Starke	21,817	.49%
White	23,116	2.71%

[American Community Survey C16001](#)

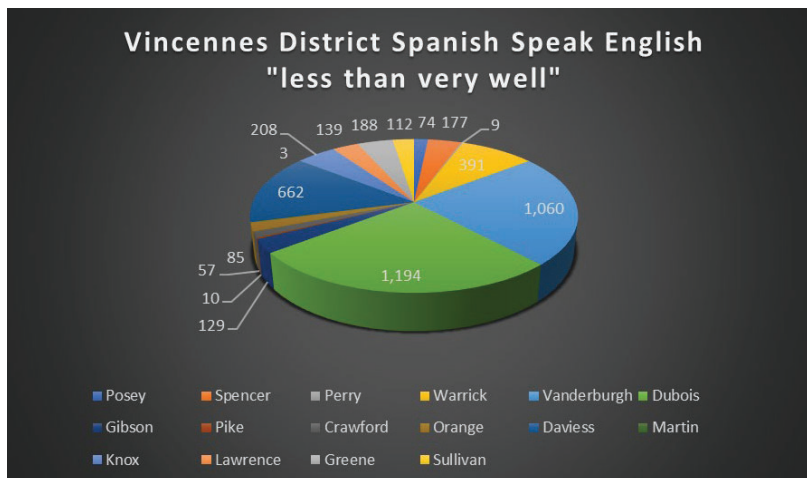
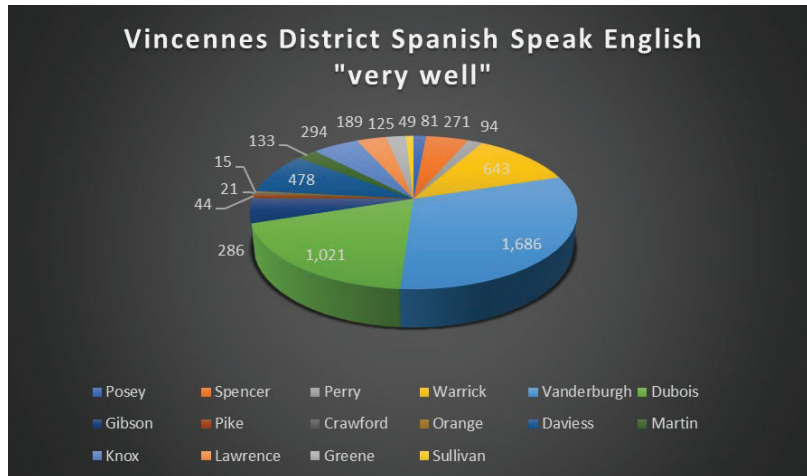
SEYMOUR DISTRICT



County	Total Residents	Percentage "less than very well"
Bartholomew	14,830	.20%
Brown	14,830	.20%
Clark	112,898	1.78%
Dearborn	47,863	.27%
Decatur	24,771	.22%
Franklin	21,448	.35%
Floyd	75,057	4.59%
Harrison	37,371	4.42%
Jackson	42,764	2.82%
Jefferson	31,198	.54%
Jennings	25,958	.99%
Johnson	149,796	.66%
Monroe	134,208	.58%
Morgan	67,470	.28%
Ohio	5,617	.20%
Ripley	27,185	.69%
Scott	22,893	.03%
Switzerland	9,311	.48%
Washington	26,440	.31%

[American Community Survey C16001](#)

VINCENNES DISTRICT



County	Total Residents	Percentage "less than very well"
Crawford	9,898	.58%
Daviess	30,595	2.16%
Dubois	40,592	5.10%
Gibson	30,968	.42%
Greene	29,245	.64%
Knox	34,355	.61%
Lawrence	42,584	.33%
Martin	9,294	.03%
Orange	18,568	.46%
Perry	18,084	.05%
Pike	11,547	.09%
Posey	23,945	.31%
Spencer	18,908	.94%
Sullivan	19,598	.57%
Vanderburgh	169,189	.63%
Warrick	59,914	.62%

[American Community Survey C16001](#)

Summary of Factor One

Spanish speakers are by far the most LEP populous and widespread throughout the state, with Spanish being the only language that meets the safe harbor threshold in Indiana districts. The district-level data assists INDOT in giving guidance on language access to its recipients throughout the state.

Factor #2: The frequency with which LEP individuals come in contact with the program

The program/project must be evaluated in relationship to the number of persons who are within the program/project area, and the number of times they have frequented the program or activity. For public meetings, a sign-in sheet or survey is utilized to capture the demographic data of the participants. Planners and project managers must provide notice to LEP persons within the project/program area so that they are aware of any programs/projects that may affect their quality of life. Programs, services, and activities that have potential impact for LEP persons include but are not limited to:

- Public involvement and public engagement meetings/hearings for construction projects affecting LEP communities or individuals
- Welcome Centers and rest areas
- Roadside assistance drivers
- Transportation maintenance workers
- Transit
- Sub-recipients
- Requests for permits
- Real estate transactions/condemnation
- Payment of tolls at Indiana Toll Roads
- Internet access: INDOT websites must be accessible to LEP persons
- Requests for certifications, licenses
- Phone communications: notices/greetings in languages other than English

Factor #3: The Importance of INDOT's Service to People's Lives

INDOT's services affect every community member. INDOT produces and distributes public safety and public service announcements for estimated travel times, notices for road closures to make construction zones safer; to reduce distracted and intoxicated driving; and to increase pedestrian, bicycle, and motorcycle safety. It is essential that INDOT effectively communicate its safety and public service announcements to the entire community, including non-English speakers. Further, INDOT is a large employer, and spends millions of dollars annually contracting work from DBEs. INDOT's planning

process relies on input from the public. INDOT's services are therefore important to every citizen including LEP person's lives, and must be accessible to everyone, regardless of ability to speak English.

Factor #4: The resources available to INDOT for LEP outreach, as well as the costs associated with that outreach.

As the state transportation agency responsible for coordinating the statewide transportation planning process, INDOT must make sure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved with the planning process. The impact of proposed transportation investments on underserved and underrepresented population groups and communities of concerns, are part of the evaluation process. INDOT provides oversight and helps ensure that LEP and other protected classes of persons are not overlooked in the transportation planning process. In doing so, INDOT's FY 2024-2028 Statewide Transportation Improvement Program (STIP) is a key document in the Federal transportation planning and programming process. Impacts to communities are recognized early and monitored continually throughout the transportation decision-making process. One method for this is through enhanced public outreach and participation methods at all points of the statewide transportation planning process ensuring meaningful participation by citizens, including LEP populations.

Additionally, INDOT continues to strive to improve its data collection efforts to better track the actual number of LEP individuals encountered in the delivery of services so that INDOT may continue to evaluate the effectiveness of its LEP Implementation Plan. Training provided to INDOT employees in person or via the online module contains information about LEP requirements and tools INDOT uses to gather information on an ongoing basis about LEP needs.

INDOT's LEP information gathering tools include the use of the following:

- Internal LEP Report Form
- "I Speak" Cards
- Ability of the public to request language services and translation services
- Use of demographic information, not limited to but including census information to determine whether LEP resources and / or alternative advertising measures should be considered as part of public involvement activities.
- Employee language questionnaires

5. INDOT'S FIVE-POINT LEP PLAN

1. Provide Notice to LEP Persons using all means reasonably calculated to provide meaningful access

USDOT LEP guidance says:

“Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons would understand.”

As a recipient of Federal Funds, INDOT must make reasonable efforts to notify the public of its eligibility for benefits, programs, and services in a language they understand. Methods used to inform LEP individuals about language assistance services may include translating outreach materials into other languages, updating non-English content in key languages on the main page of the program website and providing public service messages in non-English media describing INDOT's programs.

Some notification actions include:

- Posting signs in areas where the public is likely to read them.
- Stating in outreach documents (brochures, booklets, pamphlets, flyers) that language services are available.
- Working with community-based organizations to inform LEP persons of the language assistance available.
- Using a telephone voice mail menu in the most common languages encountered.
- Including notices in local newspapers in languages other than English for important events.
- Providing notices on non-English language radio and television stations about the availability of language assistance services for important events.
- Providing presentations and notices at schools and religious organizations for important events or where community involvement is critical.
- Providing a document translation (and/or interpretation services) request form/notice translated into other languages when INDOT is aware that significant number of persons will be impacted by INDOT programs or activities who speak a language other than English, regardless of county- wide census data.
- Publish the LEP Plan on the INDOT's website to ensure public accessibility.
- Provide LEP translation services on INDOT's website.
- With advance notice, provide interpreter services at any meeting or public hearing.

- Interpreter to include foreign language and signs for the hearing impaired.

2. Translate Vital Documents

A document is considered vital if it contains critical information for obtaining services or benefit or is required by law. To further assist INDOT employees in determining whether a document should be considered vital INDOT employees should consider whether the document’s core purpose is related public engagement activities. Public engagement activities may include:

- Solicitation of public comments
- Circulation of document for public inspection and feedback before translating it
- Circulation of public notices

Public information related to key INDOT procedures, projects, or activities which may be reasonably likely to have a significant impact on an LEP population. INDOT program areas requiring interaction with the public as a daily part of their delivery of services should assess the LEP population and the frequency and importance of contact with LEP persons to ascertain the necessity for translating vital documents. Examples of vital documents that require consideration for translation into Spanish (Indiana’s largest LEP population) include the following:

- Notices of proposed public hearings regarding proposed transportation plans, projects, or changes.
- Emergency transportation information, such as road closures.
- Notices of reduction, denial or termination of services or benefits.
- Signs in reception areas and other points of initial entry.
- Notices advising LEP persons of free language assistance.
- Statements about the services available and the right to free language assistance services in brochures, booklets, outreach, and recruitment information, and other materials routinely disseminated to the public.
- Applications or instructions regarding participating in a program or activity or to receive benefits or services.
- Consent forms.

The determination whether a document (or the information it solicits) is “vital” will depend on the importance of the program, information, encounter, or service involved, and the

consequence to the LEP person if the information in question is not accurate or received in a timely manner. Where appropriate, program managers are encouraged to create a plan for consistently determining what documents are “vital” to the meaningful access of the LEP populations they serve.

Where program managers are engaged in community outreach efforts as part of the division’s programs and activities, they should regularly assess the needs of the populations frequently encountered or affected by the program to determine whether certain critical outreach materials should be translated.

3. Interpretation Services

INDOT recognizes the need for greater oral and written communication with limited and non-English speaking persons located within the state. Central Office and each District office attempt to identify the language needs within its jurisdiction and current bilingual staff resources to meet those needs. Where communication of key or vital information is involved, INDOT employs the use of interpretation and translation services to ensure effective communication can be achieved. Best practices suggest that:

- INDOT should develop a listing of local Community-Based Organizations (CBO’s) and other stakeholders that includes the specific language skills available among each CBO's staff and volunteers. This often occurs as part of our EJ analysis during the environmental stage of project planning.
- When INDOT bilingual staff resources are insufficient to meet language assistance needs, INDOT staff should assist LEP persons in securing volunteer interpretive services from advocacy groups. In addition, INDOT employs the use of interpretation services when a request is made or when the threshold is met for the safe harbor requirement.
- Translations of commonly requested documents, bilingual staff and telephone interpreter services should be made available at locations that are readily accessible to the public, such as information desks, security checkpoints, and on public information telephone lines.

- Programs should not rely on family members or friends to translate or interpret for LEP persons. If the LEP customer insists upon using a friend or family member, it should be allowed only after language services have been offered and refused. Minor children should not be used to interpret, except in emergencies. Our LEP report form tracks whether or not this practice is occurring, when and how often.
- Each INDOT component, program or activity identified as warranting language assistance measures should budget for language services to ensure that adequate resources exist for interpreters, translation and review of documents, and outreach. Notwithstanding any limitations of the current budget, programs should include language assistance resources as items in their future budget requests. Programs should be prepared to justify any failure to request funding for language assistance where the data indicates a need for such assistance.

4. Staff Training

INDOT staff should be properly trained so they know and understand their obligations to provide meaningful access to information and services for LEP persons. INDOT's current in-person and online training materials for employees include LEP requirements and policies. Training will be updated as these policies change. INDOT will review the necessity for additional training. This training must be mandatory for staff who have the potential to interact or communicate with LEP individuals, staff whose job it is to arrange for language assistance services and managers. Training shall explain how staff can identify the language needs of an LEP individual, access and provide the necessary language assistance services, work with interpreters, request document translations and track the use of language assistance services. Bilingual staff members who communicate "in-language" to LEP individuals or who serve as interpreters or translators, should be assessed and receive regular training on proper interpreting and translation techniques, ethics, specialized terminology and topics as needed

5. Multilingual Staffing

In-house multilingual staffing is a cost-effective way to provide language services to LEP individuals. When needs dictate, bilingual ability should be considered. The challenge with this approach is that very few individuals self-identify as both bilingual and willing to provide translation services. Best practices suggest that:

- INDOT create a directory of multilingual staff willing to volunteer their language

skills on an as needed basis.

- Bilingual staff should be trained and versed in the standards of the interpreting profession.

Bilingual staff or contractors should be assessed for bilingual proficiency, interpretation skills and sensitivity to the special confidentiality issues raised by interpreting for others. Individuals providing interpretative services should possess a level of fluency and comprehension appropriate to the specific nature, type, and purpose of information at issue. Bilingual staff should be encouraged and enabled to access interpreter and translation training. The list of INDOT's LEP Staff volunteers are found in the appendices herein.

6. LEP MONITORING AND UPDATING

INDOT's Title VI Manager is responsible for monitoring and implementation of the Limited English Proficiency Plan. The Plan will be reviewed annually to determine whether updates are needed. The Title VI Manager will:

1. Coordinate identification of language service needs and strategies so that INDOT employees will have access to appropriate language services in their interactions with LEP individuals.
2. Ensure the agency's compliance with the LEP Policy and Plan.
3. Provide notice of the language assistance services in the following areas:
 - a) Posters in public areas.
 - b) "I Speak" language identification cards at reception area.
 - c) INDOT Website.
4. Conduct an annual review analyzing changes in:
 - a) Census data.
 - b) Current LEP populations affected or encountered.
 - c) Frequency of encounters with LEP language groups.
 - d) The nature and importance of activities to LEP individuals.
 - e) The availability of resources, including technological advances, sources of additional resources, and the cost incurred.
 - f) Whether the existing LEP Plan is meeting the needs of LEP individuals.
 - g) Whether INDOT employees understand the LEP Plan, and how to implement.

h) Whether identified sources for assistance are still available.

INDOT's Title VI Program Manager is:

Taffanee Keys
Civil Rights Counsel
100 N. Senate Ave. Room N758-PQ
Indianapolis, IN 46204
tkeys@indot.in.gov

7. LEP COMPLAINT PROCEDURE

The Title VI regulations provide that INDOT must investigate whenever it receives a complaint, report, or other information that alleges or indicates possible noncompliance with Title VI or its regulations which are inclusive of LEP.

Complaints of discrimination involving LEP, Title VI, and related nondiscrimination statutes will be investigated using the INDOT Title VI complaint procedures included in INDOT's Title VI Implementation Plan. INDOT's Title VI Implementation Plan can be found at:

<https://www.in.gov/indot/accessibility-and-non-discrimination/nondiscrimination-at-indot/>

Questions or comments regarding this LEP Plan or questions related to Title VI should be directed to:

Taffanee Keys
Attorney Senior (Civil Rights Counsel)
Prequalification – Policy & Compliance
Indiana Government Center North
100 N. Senate Ave., Room N758-PQ
Indianapolis, IN 46204
1-855-INDOT4U (463-6848)
tkeys@indot.in.gov

APPENDICES

- i) LEP Report Form
- ii) Language Questionnaire
- iii) Multi-lingual Employee Volunteer List
- iv) Language Identification Cards
- v) Title VI Public Involvement Survey

LIMITED ENGLISH PROFICIENCY (LEP) REPORT

USE OF FORM: This form should be used to record and report communications with or requests for services from individuals and / or entities in need of language services. If there is a language barrier between an INDOT employee in an individual or group interaction, please provide as much information regarding the interaction as possible on this form.

TRANSMITTAL: Please complete this form and deliver it by mail, facsimile, or e-mail to:

Taffanee Keys
 Attorney Senior (Civil Rights Counsel)
 Prequalification – Policy & Compliance
 Indiana Government Center North
 100 N. Senate Ave., Room N758-PQ
 Indianapolis, IN 46204
 Email: tkeys@indot.in.gov

Date of Form Completion:	INDOT Employee Completing Form:	INDOT Employee Job Title / Role:	INDOT Employee Work Phone:
Date of LEP Issue:	Was there a request for language services? [] YES [] NO	If requested, by whom:	INDOT Employee E-mail:
Contact Type: <input type="checkbox"/> Individual face-to-face <input type="checkbox"/> Individual by phone <input type="checkbox"/> Individual in writing <input type="checkbox"/> Agency-sponsored Public Meeting <input type="checkbox"/> Event (describe below) <input type="checkbox"/> Contact by outside organization <input type="checkbox"/> Other (please describe below)		Level of Language Barrier: <input type="checkbox"/> Communication was not possible <input type="checkbox"/> Communication was significantly impaired. <input type="checkbox"/> Communication was partially possible <input type="checkbox"/> Communication was possible due to interpretation provided by a non-INDOT sponsored interpreter. <i>Was this interpreter a minor</i> [] YES [] NO <input type="checkbox"/> Communication was possible due to language services provided by interpreter or translator retained by INDOT or the forum in which the services were required.	
Number of people requiring language services:			
Language for which LEP services were required:	How was this determined: [] I Speak Cards [] Self-identified [] Other (describe)	Type of services needed: (check all that apply) [] In person interpretation [] Telephone interpretation [] Written material translation [] Other	

Please use the back of this form if additional information is required. Contact Taffanee Keys with any questions.

www.in.gov/dot/
An Equal Opportunity Employer



LIMITED ENGLISH-PROFICIENCY REPORT FORM

Language Questionnaire

Your assistance is needed! As a recipient of federal funds, the Indiana Department of Transportation (INDOT) is required to evaluate its programs and activities for language accessibility, and to develop a procedure for gathering statistical data regarding participants and beneficiaries of its federal-aid highway programs and activities (23 CFR §200.9(b)(4)). INDOT distributes this voluntary survey to fulfill that requirement.

You are not required to complete this questionnaire. Submittal of this information is voluntary; however, we ask you to complete the questionnaire as you may be able to assist others by translating important information if needed. INDOT will use the survey responses to monitor its programs and activities for compliance with Title VI of the Civil Rights Act of 1964, as amended (Title VI) and its related statutes and regulations. If you have any questions regarding INDOT's responsibilities under Title VI, please contact INDOT's Title VI/ADA Program Manager, Taffanee Keys at 100 N Senate N758-PQ, Indianapolis, IN 46204, e-mail: tkeys@indot.in.gov.

Please submit the completed survey to your Human Resources Manager.

Employee Contact Information

Employee Name: _____

Work Division/District: _____

Work Phone Number: _____

Work Email Address: _____

Survey Completion Date: _____

Questions

1. Do you speak, write, and/or read another language in addition to English? Yes No
2. If you speak more than one language, would you be willing to volunteer to provide language assistance as needed, if there is a need for translation or interpreter assistance? Yes No

If you answered yes to questions 1 and 2, please proceed to question 3; however, if you answered no to either question, you have completed the questionnaire.

MULTI-LINGUAL EMPLOYEE VOLUNTEER LIST

Last Name	First Name	Phone	Email	District	Language 1	Native Speaker	Language 2	Native Speaker	Language 3	Native Speaker	Language 4	Native Speaker	Proficiency	Notes	Input Date
McCravy	Bake			Seymour	American Sign Language										2/20/2012
Torres	Theresa				American Sign Language		Spanish						Limited		10/17/2012
Harmon	Terry	(765) 683-1097	tharmon@indot.in.gov	Greenfield	American Sign Language										
Ringle	Paul	(219) 866-7422	pringle@indot.in.gov	LaPorte	American Sign Language										
Tucker	Tabi	(812) 895-7302	ttucker@indot.in.gov	Vincennes	American Sign Language										
Tlahun	Abachew	(317) 467-3946	atlahun@indot.in.gov	Greenfield	Amharic								Fluent/High		
Al-Jundub	Amjad M.	(317) 945-7666	amj-aljundub@indot.in.gov	Greenfield	Arabic										
Dughalsh	Khali	(812) 895-7377	kdughalsh@indot.in.gov	Vincennes	Arabic										
Griffler	Darcy	(219) 325-7591		LaPorte	Armenian										
Sarkar	Abid	(268) 797-1886	abid01@students.loy.edu	Fort Wayne	Bengali									Co-op	1/9/2012
Kwong	U-Chung Alex	(765) 361-5388	ukwong@indot.in.gov	Crawfordsville	Chinese (Cantonese)		Chinese (Mandarin)						Intermediate/High	Intermediate Cantonese	
Tsai	Jen-hien	(812) 897-1402	htsai@indot.in.gov	Vincennes	Chinese (Mandarin)								Fluent/High		
Azail	Shahinae M.	(317) 467-3973	shahinae@indot.in.gov	Greenfield	Farsi		Hindi		Urdu		Arabic		Intermediate/High		
Maksoof	Hamid	(812) 305-5003	hmaksoof@indot.in.gov	Vincennes	Farsi								Fluent/High		
Swope	Bruce	(574) 926-4067		LaPorte	French		Greek						Limited/Intermediate	Limited Greek Translation	
Devin	Chris	(812) 524-3952		Seymour	French										3/5/2012
Carrow	Tom	(317) 697-5961	tcarrow@indot.in.gov	Greenfield	German								Limited/Intermediate		
Mina	Robert			Fort Wayne	German								Fluent/High		11/28/2011
Roe	Alex	(765) 480-6049		Greenfield	German										
Skinner	Wayne	(219) 325-7554	wskinner@indot.in.gov	LaPorte	German								Limited		
Patel	Utpal	(317) 467-3976	upatel@indot.in.gov	Greenfield	Hindi		Urdu		Gujarati				Fluent/High	Limited Urdu	
Hamelman	Josep	(812) 524-3952	jhamelman@indot.in.gov		Italian										
Ostrega	Barb	(219) 325-7503	bostrega@indot.in.gov	LaPorte	Polish		Spanish						Limited/Intermediate	Limited Spanish Skills	
Rogers	Michael	(317) 467-3472	mrogers@indot.in.gov	Greenfield	Spanish		Irish						Limited/Intermediate		
Alonzo	Elizabeth	(268) 969-8274	elalonzo@indot.in.gov	Fort Wayne	Spanish								Limited/Intermediate		
Bowman	Sarah	(260) 696-8265	sbowman@indot.in.gov	Fort Wayne	Spanish								Limited/Intermediate		
Bravo	Jesse				Spanish										10/31/2011
Cox	Edward	(812) 524-3762	ecox@indot.in.gov	Seymour	Spanish								Limited		
De LaRosa	Jesse	(812) 890-9258		Vincennes	Spanish								Intermediate/High		
Flores	Steven	(812) 524-3969	sflores@indot.in.gov	Seymour	Spanish								Limited/High	Limited (Translation)	
Gomez	Mario	(219) 808-2082	management110@yahoo.com	LaPorte	Spanish										
Hess	Robert Lee	(317) 467-3982	rhess@indot.in.gov	Greenfield	Spanish								Limited	Former Peace Corp Volunteer	
Mendoza	Eva Maria Uribe	(812) 867-9017	emendoza@indot.in.gov		Spanish		X								10/17/2012
Revilla	Dawn		drevilla@indot.in.gov		Spanish										10/17/2011
Reyes	Grace	(317) 467-3900	greyes@indot.in.gov	Greenfield	Spanish								Fluent/High		
Rodriguez	Arlene			Fort Wayne	Spanish								Intermediate/High	Seasonal Employee	12/12/2011
Romeo, Jr.	Raul	(219) 939-3900		LaPorte	Spanish								Fluent/High		
Winebrinner	Robert Blane				Spanish								Intermediate		11/28/2011
Colglazier	Maricor	(812) 524-3968	mcolglazier@indot.in.gov	Seymour	Tagalog		Creolano						Limited	High Cebuano (Interpretation)	

Last Updated 5/7/2012



Language Identification Card

I work for the U.S. Census Bureau. Is someone here now who speaks English and can help us?
If not, someone may contact you who speaks _____.

Español (Spanish 02)

Trabajo para la Oficina del Censo de los EE. UU. ¿Se encuentra alguien que hable inglés y pueda ayudarnos? Si no, alguien que habla español podría comunicarse con usted.

普通话、广东话 (Chinese simplified)

我是美国人口普查局的工作人员。请问您这里有没有会说英语的人可以帮助我们？

(Mandarin 03): 如果没有，可能会有会讲普通话的人与您联系。

(Cantonese 04): 如果没有，可能会有会讲广东话的人与您联系。

如果您閱讀繁體中文，請參閱第2頁（普通話或廣東話）(Chinese traditional on pg 2)

Tiếng Việt (Vietnamese 05)

Tôi làm việc cho Cục Thống Kê Dân Số Hoa Kỳ. Hiện có ai ở đây biết nói tiếng Anh và có thể giúp quý vị và tôi không? Nếu không, một nhân viên nói tiếng Việt có thể sẽ liên lạc với quý vị.

한국어 (Korean 06)

저는 미국 인구조사국에서 일하고 있습니다. 여기 계신 분 중에서, 영어를 하실 수 있어서 저희를 도와주실 수 있는 분이 혹시 계신지요? 없으시면, 한국어를 하시는 분이 연락을 드릴 수도 있습니다.

Русский (Russian 07)

Я представляю Бюро переписи населения США. Присутствует здесь кто-нибудь, кто говорит по-английски и мог бы помочь нам? Если нет, то тогда возможно, с Вами свяжется наш сотрудник, говорящий по-русски.

العربية (Arabic 08)

أنا أعمل بـمكتب الإحصاء الأمريكي. هل يوجد شخص هنا يتكلم الإنجليزية و يمكنه ان يساعدنا الآن؟ إذا لا، فقد يتصل بكم شخص يتكلم اللغة العربية.

Tagalog (Tagalog 09)

Nagtatrabaho ako para sa Kawanihan ng Senso ng U.S. Mayroon ba rito ngayong nagsasalita ng Ingles at maaaring tumulong sa amin? Kung wala, maaaring may kumontak sa inyo na nagsasalita ng Tagalog.

Polski (Polish 10)

Jestem pracownikiem Urzędu Spisu Ludności USA. Czy w tej chwili jest tu ktoś, kto mówi po angielsku i może nam pomóc? Jeżeli nie, może skontaktować się z Państwem ktoś, kto mówi po polsku.

Français (French 11)

Je travaille pour le Bureau de recensement des États-Unis. Y a-t-il quelqu'un ici qui parle anglais et qui pourrait nous aider? Sinon, quelqu'un qui parle français pourrait vous contacter.

Kreyòl Ayisyen (Haitian Creole 12)

Mwen travay pou Biwo Resansman Etazini. Èske gen yon moun la ki pale anglè ki ka ede nou? Si pa genyen, yon moun isit la ki pale kreyòl ka rele ou.

Português (Portuguese 13)

Trabalho para a Agência do Censo dos EUA. Há alguém aqui, agora, que fale inglês e que possa nos ajudar? Caso não haja, uma pessoa que fala português poderá entrar em contato com você.

日本語 (Japanese 14)

私はアメリカ合衆国国勢調査局の係員です。こちらには英語を理解できこの調査にご協力いただける方がいらっしゃいますか？もしない場合は、日本語を話す係員があなたに連絡をすることがあります。

D-ID (09-19-19)

Demographics Form

Thank you for taking a few minutes to complete this survey. **Answering the following questions is optional** but your response will be extremely helpful in ensuring the fairness and equity of INDOT's public involvement process. Submissions will be kept confidential and separate from any personally identifiable information so that respondents will remain anonymous. These questions are not listed in any particular order.

What is your race?

- Black or African American American Indian or Alaskan Native Asian Hispanic or Latino
 White Native Hawaiian or Other Pacific Islander Prefer to self-describe: _____

What is the primary language spoken in your home?

- English Spanish Other (Please specify): _____

Was the project information translated into other languages appropriately?

- Yes No Not Applicable

How many people live in your household?

- 1 - 2 3 - 5 6 +

What are the age ranges of those living in your household? (Check all that apply.)

- Under 18 19 - 44 45 - 64 65 +

What is your annual household income?

- Less than \$10,000 \$10,000 - \$24,999 \$25,000 - \$49,999 \$50,000 - \$74,999
 \$75,000 - \$99,999 \$100,000 - \$149,999 \$150,000 +

What is the highest level of education completed by members of your household?

- None Elementary school Middle school High school College/university
 Graduate degree Other (Please specify): _____

Do any individuals living in your home have a physical or mental impairment which substantially limits one or more major life activities?

- Yes No Prefer not to answer

Please suggest additional ways you think INDOT can improve inclusiveness of our public outreach efforts:

Thank you for helping INDOT improve its
public involvement practices!

Please submit this page only:

Email insert_email@indot.IN.gov or mail to:

Attn: Public Involvement

Indiana Department of Transportation

100 N Senate Ave.

Indianapolis, IN 46204