



RIPLEYCOUNTY, INDIANA

TITLE VI

NONDISCRIMINATION IMPLEMENTATION

PLAN & POLICY

Prepared by: J. Patrick Rose, Title VI Coordinator

Adopted by: Ripley County Board of Commissioners

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RIPLEYCOUNTY, INDIANA
TITLE VI NONDISCRIMINATION PLAN & POLICY

1. POLICY STATEMENT

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, 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” (42 U.S.C. Section 2000d).

Pursuant to Title VI of the Civil Rights Act of 1964, as amended, and the Civil Rights Restoration Act of 1987, Ripley County, Indiana, hereinafter referred to as “Ripley County,” will not exclude from participation in, deny the benefits of, or subject to discrimination any individual on the grounds of race, color, or national origin, sex, age, disability, limited English proficiency and income status.

The Ripley County Board of Commissioners has prepared a statement of nondiscrimination and its intent to comply and enforce Title VI of the Civil Rights Act of 1964 that statement is posted in all public buildings owned and operated by Ripley County Government. Additionally, the posting provides information about how to raise concerns or lodge complaints related to potential violations of Title VI. A copy of this statement is also provided in this plan (**Appendix I**).

2. TITLE VI COORDINATOR

The Ripley County Board of Commissioners has appointed a Title VI Coordinator. This position is reappointed annually at the first County Commissioners’ organizational meeting of each year. The current Title VI Coordinator is:

J. Patrick Rose
ADA & Title VI Coordinator
Office of the County Commissioners
Ripley County Government
102 West First North Street
Versailles, IN 47042
Office Phone: (812) 689-0505
Email: adacoordinator@ripleycounty.com

TITLE VI COORDINATOR (continued)

The Ripley County Title VI Coordinator will:

- Administer and implement Ripley County's Title VI plan and policy.
- Develop and maintain a Title VI liaison team (**Appendix D**) to ensure departments are implementing, monitoring and complying with Ripley County's Title VI plan and policy.
- Conduct Title VI yearly reviews with liaisons in an effort to assist with identifying, addressing and eliminating discrimination concerns in every department.
- Conduct or facilitate Title VI training programs with departments and ensure policies are disseminated to employees.
- Work with liaisons to develop and disseminate Title VI information to contractors, subcontractors, vendors and consultants.
- Work with liaisons to ensure community involvement and outreach is in compliance with Title VI and provides equitable opportunities for participation.
- Ensure Title VI language is included in Ripley County contracts.
- Collect, review and preserve statistical data (race, color, national origin, language, gender, etc.) of participants in activities and programs to ensure Ripley County's continued compliance with Title VI.
- Collect, review and preserve data regarding the number of federally funded projects awarded or ongoing for the past three (3) years.
- Maintain all Title VI records and correspondence, including but not limited to, signed employee acknowledgements, complaints and all correspondence regarding such, requests for language services, demographic statistics, department compliance reviews and all Title VI federal agency correspondence and records.
- Address all Title VI discrimination complaints.
- Review and update the Title VI plan and policy as needed or required.
- Prepare and submit the annual Title VI update report.

3. **EMPLOYER/EMPLOYEE DISSIMINATION & TRAINING**

Title VI plan and policy education and literature will be provided to all Ripley County employees. Ripley County employees will be required to sign an acknowledgement (**Appendix E**) of receipt indicating they have received and reviewed Title VI policy guidelines. New employees will be provided with education and literature at new employee orientation. Employees will be provided with updated education and literature as Ripley County deems necessary.

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

4. CONTRACTORS, SUBCONTRACTORS, VENDORS & CONSULTANTS

All contractors, subcontractors and vendors who receive payments from Ripley County where funding originates from any Federal assistance programs are subject to the provisions of Title VI of the Civil Rights Act of 1964, as amended. Ripley County will include Title VI language, as per the Standard U.S. DOT Title VI Assurances (**Appendices A, B, & C**), as relevant and appropriate, in written agreements and bid notices. Written agreements relevant to Title VI shall not contain any form of discrimination, either written or implied.

5. CONCERNS/COMPLAINT PROCESS

Ripley County will take prompt and reasonable actions to thoroughly investigate concerns and complaints. Any individual, who believes they have been subjected to discrimination, may file a complaint with the Ripley County Title VI Coordinator. Complaint forms (**Appendix F**) can be found on Ripley County's website: www.ripleycounty.com, or by contacting the Ripley County Title VI Coordinator. In order for the complaint to be considered, the complainant must file the appropriate documentation:

1. Within 180 days of the alleged act of discrimination; or
2. Where there has been a continuing course of alleged discriminatory conduct, on the date in which the alleged conduct was discontinued.

Complaints shall be made in writing and shall be signed by the complainant and/or the complainant's representative. Complaints must contain the following and describe as completely as possible the facts and circumstances surrounding the alleged discrimination:

- Name of the complainant.
- Contact information (telephone number, address, email address).
- Basis for the allegation(s) (i.e., race, color, national origin, gender, age, etc.).
- A detailed description of the alleged discrimination (how, when, where & why they believe they were discriminated against including the location(s), name(s) and contact information of all witnesses, if applicable).
- Any other information that is deemed significant.

If the complainant is unable or incapable of providing a written statement, a verbal complaint may be made to the Ripley County Title VI Coordinator. Under these circumstances, the complainant will be interviewed and the Ripley County Title VI Coordinator will assist the complainant in completing a written statement.

CONCERNS/COMPLAINT PROCESS (continued)

Within fifteen (15) calendar days after receipt of the complaint, the Title VI Coordinator will arrange to speak or meet with the complainant to discuss the complaint and the possible resolutions if applicable. If a complaint is deemed incomplete, additional information will be requested. The complainant has sixty (60) business days to respond to the request for additional information. A complainant's failure to respond to the request within sixty (60) business days may result in the administrative closure of the complaint.

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

The Title VI Coordinator will conduct a complete and thorough investigation of complaints inside Ripley County's jurisdiction and based upon the information obtained will render a final written response letter to the complainant or their representative by registered mail or hand delivery within sixty (60) business days. The final written response will include a description of the complaint, a summary of the investigation and the findings of such, summaries of all individuals interviewed, and if appropriate, recommendations and resolutions. All written complaints, investigations and responses will be retained by Ripley County for at least three (3) years.

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

(Appendix G)

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

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

6. PUBLIC DISSEMINATION

Title VI information shall be displayed in Ripley County buildings and all places in which public meetings are held. The name and contact information of the Ripley County Title VI Coordinator will be displayed on the Title VI information (**Appendix I**).

The Ripley County Title VI plan and policy and complaint procedures are available on the Ripley County website at www.ripleycounty.com. Copies of the plan will be provided upon request. Any questions or comments regarding this plan should be directed to the Title VI Coordinator.

7. COMMUNITY INVOLVEMENT & OUTREACH

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

The Ripley County Council and the Ripley County Board of Commissioners meet regularly and those meetings are open to the public, as well as other various Ripley County boards and meetings. Meetings that are open to the public are advertised via local media and posted publicly in accordance with the Indiana Open Door Law. The Board of County Commissioners suggests that all public meetings be posted on the Ripley County website at www.ripleycounty.com.

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

8. DATA COLLECTION

Pursuant to 23 CFR 200.9(b) (4), Ripley County shall collect and analyze statistical information regarding demographics to assist in monitoring and ensuring nondiscrimination in all of its programs and activities. The county will utilize a voluntary Title VI public involvement survey (Appendix H) at all public hearings and meetings. The survey allows respondents to remain anonymous and requests information regarding the respondent's gender, ethnicity, race, age, income and if they are disabled. The facilitator of the public meetings will announce to attendees that the survey is available, explain its purpose, and remind attendees to complete the voluntary survey, if desired. Completed surveys will be retained by the Title VI Coordinator for three (3) years.

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

9. **SECTION 504 /AMERICANS WITH DISABILITIES (ADA)**

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

Ripley County maintains a current ADA Transition Plan to insure citizens have access to and understand the county's commitment to nondiscrimination on the basis of disability. For more information regarding Ripley County's ADA policy, please visit Ripley County's website at www.ripleycounty.com and select the ADA & Title VI Compliance Department page.

10. **LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

Ripley County has prepared this plan in accordance with Title VI of the Civil Rights Act of 1964, as amended, which states that no person shall be subjected to discrimination on the basis of race, color or national origin. The purpose of this plan is to help identify reasonable steps for providing language assistance to individuals with limited English proficiency who wish to access services provided by Ripley County.

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

In order to prepare this plan, Ripley County utilized the U.S. Department of Transportation four-factor LEP analysis which considers the following factors:

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

LIMITED ENGLISH PROFICIENCY (LEP) PLAN (continued)

LEP ANALYSIS/OUTCOME AND PLAN:

FACTOR 1 - The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Ripley County program, activity or service.

Using 2010 census data, it has been estimated that Ripley County's population was 28,818. The demographics by ethnicity indicate that 28,132 citizens identified as non-Hispanic (97.6% of the total population).

Language Other than English:

Spanish: 445 citizens 1.3% of the population

Asian and Pacific Island language: 146 citizens 0.1% percent of the population

Other Indo-European language: 667 citizens 0.1% percent of the population

Other Language: 9 citizens 0.0% of the population.

Therefore, it is estimated that 97.4% of Ripley County's population speak only English.

FACTOR 2 - The frequency with which LEP persons come in contact with Ripley County programs, activities or services.

Ripley County is beginning a process to assess the frequency with which LEP individuals come in contact with any of our programs, activities or services. This will be accomplished by utilization of the Voluntary Title VI Public Involvement Survey (**Appendix H**), regularly questioning department heads and elected officials on their department's encounters with LEP individuals, and asking that any requests for language assistance are reported to the Title VI Coordinator. Based on the results of our research Ripley County will make a determination regarding the amount of contact with LEP individuals.

5. *FACTOR 3* - The nature and importance of programs, activities or services provided by Ripley County to the LEP population.

The majority of federal funding dollars that are provided to Ripley County are applied to transportation-related needs. Some federal funding is received in the way of grants for programs for criminal offenders, adult protective services, emergency planning and other important programs that serve the entire county population.

Relative to transportation, the county highway department is responsible for all roads, bridges, and small structures (less than 20 foot span) within Ripley County which are not state highways and which are not within the corporate limits of a city or town. They are also responsible for bridges which have a span of 20 or more feet on all roads in Ripley County which are not state highways. Ripley County has 11 townships with many 740 miles of roadway and rights-of-way, 135 bridges, and over 12 buildings to maintain.

Ripley County strives for safe and accessible roadways, and continues to work to improve the transportation infrastructure for the citizens of Ripley County. Transportation in Ripley County is critical to the public as it provides access to emergency services (fire, police, etc.), health care, employment and other essential individual needs. If this information is not accessible to people with limited English proficiency, the consequences to the individuals relying on these services could be life-threatening.

6. *FACTOR 4* - The resources available to Ripley County and the overall costs to provide LEP assistance.

Because, in part, of the small portion of non-English speaking citizens in the county, resources for multi-lingual interpreters are limited. Additionally, translation of signage and county forms into various languages would be extremely costly when measured against the demonstrated need.

Due to the small portion of non-English-speaking citizens, the county will continue to monitor the population growth and will make efforts to respond to the needs of non-English speaking citizens if such assistance is requested and is not deemed cost prohibitive; on a case-by-case basis.

The analyses of the four factors suggest that LEP services are not substantiated at Ripley County at this time. Ripley County, however, has committed to the following:

- Offer, wherever possible and not deemed financially prohibitive, translators for Ripley County public meetings, programs and activities if requested within forty-eight (48) hours in advance.
- Work with the local community college, Ivy Tech, to determine what resources they may have for language education and interpreters.
- Build a list of language assistance professionals and resources.
- In any programs or services where administrators see a need for dual language documents or personal assistance, departments are encouraged to use good judgment and work to accommodate citizens.
- Continually monitor our website and make adjustments as necessary to ensure information is accessible to LEP individuals when appropriate.

Ripley County is aware that the community profile is ever-changing; therefore, this LEP plan and the four factor analysis will be re-evaluated on an annual basis to ensure that the plan remains reflective of the community's needs. Individuals requiring special language services or accommodations should contact Ripley County's Title VI Coordinator.

11. ENVIRONMENTAL JUSTICE

Environmental Justice requires additional public participation and mitigation strategies when programs are in a disproportionately low income or minority area. Ripley County is committed to performing environmental justice analysis for any project that may result in a disproportionately high adverse impact on a minority or low-income population in or near the project area.

Because Ripley County has much rural land mass and income levels do not vary largely from one portion of the county to the other, we do not anticipate this analysis being routinely necessary. However, when a road project that impacts a community is planned, the Ripley County Commissioners will be mindful of the income levels in the impacted area.

In performing such analysis, demographic data will be obtained and analyzed before and/or during the scoping stage of the project. The information obtained will be used in coordination planning and public involvement planning.

When the need for environmental justice analysis is appropriate, the county will utilize the NEPA (National Environmental Policy Act) process and guidelines as defined on the NEPA website: www.epa.gov/NEPA

<input type="checkbox"/>	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/>	Խնդրում ենք նշում կատարել այս քանակուսում, եթե խոսում կամ կարդում եք հայերեն:	2. Armenian
<input type="checkbox"/>	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/>	ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/>	Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/>	如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/>	如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
<input type="checkbox"/>	Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/>	Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
<input type="checkbox"/>	Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
<input type="checkbox"/>	Mark this box if you read or speak English.	11. English
<input type="checkbox"/>	اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بنید.	12. Farsi

- | | | |
|--------------------------|--|--------------------|
| <input type="checkbox"/> | Cocher ici si vous lisez ou parlez le français. | 13. French |
| <input type="checkbox"/> | Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen. | 14. German |
| <input type="checkbox"/> | Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά. | 15. Greek |
| <input type="checkbox"/> | Make kazyè sa a si ou li oswa ou pale kreyòl ayisyen. | 16. Haitian Creole |
| <input type="checkbox"/> | अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ। | 17. Hindi |
| <input type="checkbox"/> | Kos lub voj no yog koj paub twm thiab hais lus Hmoob. | 18. Hmong |
| <input type="checkbox"/> | Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet. | 19. Hungarian |
| <input type="checkbox"/> | Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano. | 20. Ilocano |
| <input type="checkbox"/> | Marchi questa casella se legge o parla italiano. | 21. Italian |
| <input type="checkbox"/> | 日本語を読んだり、話せる場合はここに印を付けてください。 | 22. Japanese |
| <input type="checkbox"/> | 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오. | 23. Korean |
| <input type="checkbox"/> | ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກົດພາສາລາວ. | 24. Laotian |
| <input type="checkbox"/> | Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim. | 25. Polish |

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Economics and Statistics Administration
U.S. CENSUS BUREAU

- | | | |
|--------------------------|--|----------------|
| <input type="checkbox"/> | Assinale este quadrado se você lê ou fala português. | 26. Portuguese |
| <input type="checkbox"/> | Însemnați această căsuță dacă citiți sau vorbiți românește. | 27. Romanian |
| <input type="checkbox"/> | Пометьте этот квадратик, если вы читаете или говорите по-русски. | 28. Russian |
| <input type="checkbox"/> | Обележите овај квадратик уколико читате или говорите српски језик. | 29. Serbian |
| <input type="checkbox"/> | Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky. | 30. Slovak |
| <input type="checkbox"/> | Marque esta casilla si lee o habla español. | 31. Spanish |
| <input type="checkbox"/> | Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. | 32. Tagalog |
| <input type="checkbox"/> | ให้กาเครื่องหมายในช่องด้านหน้าหรือพูดภาษาไทย. | 33. Thai |
| <input type="checkbox"/> | Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. | 34. Tongan |
| <input type="checkbox"/> | Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою. | 35. Ukrainian |
| <input type="checkbox"/> | اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔ | 36. Urdu |
| <input type="checkbox"/> | Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ. | 37. Vietnamese |
| <input type="checkbox"/> | באציכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש. | 38. Yiddish |

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