

Northeastern Indiana Regional Coordinating Council



Title VI Documentation

September 2025

Northeastern Indiana Regional Coordinating Council's Title VI Non-Discrimination Notice and Policy

The Northeastern Indiana Regional Coordinating Council values each individual's civil rights and wishes to provide equal opportunity and equitable service for the citizens of this state. As a recipient of federal funds, the Northeastern Indiana Regional Coordinating Council conforms to Title VI of the Civil Rights Act of 1964 (Title VI) and all related statutes, regulations, and directives, which provide that no person shall be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from NIRCC on the grounds of race, color, or national origin. NIRCC further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, regardless of whether those programs and activities are federally funded.

The Northeastern Indiana Regional Coordinating Council's policy ensures nondiscrimination compliance, on the grounds of race, color, national origin disability, limited English proficiency (LEP), as provided by Title VI of the Civil Rights act of 1964 and related Nondiscrimination authorities.

The following nondiscrimination statutes and authorities include but are not limited to:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C § 2000d et seq.);
- Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. § 324 et seq.);
- The Age Discrimination Act of 1975, as amended (42 U.S.C. § 6101 et seq.);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.); • Americans With Disabilities Act of 1990; • The Civil Rights Restoration Act of 1987;
- 49 CFR Part 21;
- 23 CFR Part 200;
- 49 CFR Part 303
- USDOT Order 1050.2A;
- Executive Order # 13166 (Limited-English-Proficiency).

No person will be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Northeastern Indiana Regional Coordinating Council's program or activity. Every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. The Northeastern Indiana Regional Coordinating Council's sub-recipients, grant recipients, and contractors must also comply with this policy.

The Northeastern Indiana Regional Coordinating Council's Civil Rights Officer and program areas must work closely to implement their mutual Title VI nondiscrimination program responsibilities. Therefore, each program area will take full responsibility for preventing discrimination and

ensuring nondiscrimination compliance in all of the Northeastern Indiana Regional Coordinating Council's programs and activities.

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

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

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By: 
Daniel S. Avery
Executive Director

Dated: September 2, 2025

Agency: Northeastern Indiana Regional Coordinating Council

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Northeastern Indiana Regional Coordinating Council

Standard Title VI/Non-Discrimination Assurances DOT Order No. 1050.2A

The Northeastern Indiana Regional Coordinating Council (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 Indiana Department of Transportation, 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 Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

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 Indiana Department of Transportation.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these 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 hereby gives the following specific assurance with respect to its Federal Aid Transportation Program:

1. That the Recipient agrees that each “program” and each “facility 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 Transportation Program and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

“The Northeastern Indiana Regional Coordinating Council 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 insure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.”

3. That the Recipient shall insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Act and the Regulations.
4. That the Recipient shall insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient shall include the appropriate 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 Federal Aid Transportation Program; and

(b) for the construction or use of or access to space on, over or under real property acquired, or improved under the applicable activity, project, or program.

8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

(a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or

(b) the period during which the Recipient retains ownership or possession of the property.

9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other recipients, sub-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 Act, the Regulations and this Assurance.

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

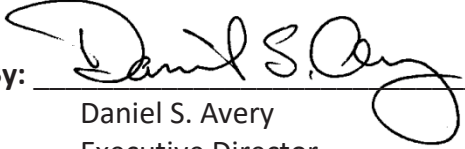
By signing this ASSURANCE, the Northeastern Indiana Regional Coordinating Council also agrees to comply (and require any subrecipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the Northeastern Indiana Regional Coordinating Council 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 Northeastern Indiana Regional Coordinating Council. You must keep records, reports, and submit the material for review upon request to Northeastern Indiana Regional Coordinating Council, 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 Northeastern Indiana Regional Coordinating Council gives this Assurance in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, 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 Transportation 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 Transportation Program. The person(s) signing below is authorized to sign this Assurance on behalf of the Recipient.

Northeastern Indiana Regional Coordinating Council

Recipient

By:  _____
Daniel S. Avery
Executive Director

Dated: September 2, 2025

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 Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, (hereinafter referred to as DOT), Title 49, Code of Federal Regulations, part 21, and the Federal Highway Administration (hereinafter "FHWA"), Title 23, Code of Federal Regulations, Part 200, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** 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 Northeastern Indiana Regional Coordinating Council, the Indiana Department of Transportation, 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 Northeastern Indiana Regional Coordinating Council, the Indiana Department of Transportation, 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 Nondiscrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the **(Title of Modal Operating 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 **(Title of Modal Operating 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 shall be included in deeds effecting or recording the transfer of real property, structures or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the Department of Transportation, as authorized by law, and upon the condition that the Northeastern Indiana Regional Coordinating Council 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 Transportation Program and the policies and procedures prescribed by the Indiana Department of Transportation or the Federal Highway Administration of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation and Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. §2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Northeastern Indiana Regional Coordinating Council 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 Northeastern Indiana Regional Coordinating Council and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and shall be binding on the Northeastern Indiana Regional Coordinating Council, its successors, and assigns.

The Northeastern Indiana Regional Coordinating Council, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person shall on the grounds of 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 the Northeastern Indiana Regional Coordinating Council shall use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, 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 – Effectuation of Title VI of the Civil Rights Act of 1964, Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes-Implementation and Review Procedures, and as said Regulations may be amended [,] and (3) that in the event of breach of any of the above-mentioned nondiscrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and

the above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assign as such interest existed prior to this instruction.*

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

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

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

- A. The (grantee, licensee, 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 land”] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which A 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 other requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.

- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, the Northeastern Indiana Regional Coordinating Council 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 said (lease, license, permit, etc.) had never been made or issued.*

- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the Northeastern Indiana Regional Coordinating Council will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of the Northeastern Indiana Regional Coordinating Council and its assigns.*

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

**CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED
UNDER THE ACTIVITY, FACILITY, OR PROGRAM**

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the Northeastern Indiana Regional Coordinating Council pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her 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 he 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, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes-Implementation and Review Procedures, and as said Regulations may be amended.

- B. With respect to (licenses, leases, permits, etc.) in the event of breach of any of the above Non-discrimination covenants, the Northeastern Indiana Regional Coordinating Council will have the right to terminate the (license, lease, 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, lease, permit, etc., as appropriate) had never been made or issued.*

- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, the Northeastern Indiana Regional Coordinating Council will there upon revert to and vest in and become the absolute property of the Northeastern Indiana Regional Coordinating Council 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 Non-Discrimination 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 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).

Introduction

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have had a longstanding policy of actively ensuring nondiscrimination in federally funded activities under Title VI of the 1964 Civil Rights Act. In recent years, a renewed emphasis on Title VI issues has become a more integral focus of the transportation planning and programming process. This document establishes a framework for the Northeastern Indiana Regional Coordinating Council's (NIRCC) efforts to ensure compliance with Title VI and related statutes regarding nondiscrimination. NIRCC serves the Counties of Adams, Allen, DeKalb and Wells in Northeast Indiana as a Regional Planning Organization and Regional Transportation Planning Organization. NIRCC is the federally designated Metropolitan Planning Organization (MPO) for the Fort Wayne-New Haven-Allen County Metropolitan Planning Area. NIRCC has served in these capacities for more than 50 years. Established in 1974, NIRCC provides comprehensive, coordinated planning for the orderly growth and development of the region. The Council works to foster regional cooperation within its four-county area, and partners with other regional agencies to extend cooperative planning and coordination efforts to six additional counties that include Huntington, LaGrange, Noble, Steuben, Wabash and Whitley in Northeast Indiana. As a Regional Planning Agency, NIRCC advises state and local governments on issues of regional policy and capital funding concerning transportation, economic development, the environment, and community development.

NIRCC fulfills these obligations by providing technical assistance and services; conducting high priority studies that respond to the requests and demands of state and local governments; fostering cooperation among various constituencies to forge a consensus on diverse regional issues; determining and meeting the needs of the private sector; and continuing public outreach efforts that promote two-way communication and enhance public awareness of regional issues.

Governance and the Boards

NIRCC's Board and Urban Transportation Advisory Board (UTAB) govern the Council and Council Activities. The NIRCC Board is a 15-member body having the authority and responsibility to make decisions affecting the entire organization as well as the four-county region; creates and defines the duties of the Office of the Executive Director and the various NIRCC committees. In its capacity as the MPO for the Fort Wayne Urbanized Area, the NIRCC Board has established UTAB as the MPO Policy Board that establishes regional transportation policies, determines the allocation of available transportation funds, prioritizes transportation projects and develops a long-range plan for the region. UTAB, as the MPO Policy Board, approves and adopts the Unified Planning Work Program, Transportation Improvement Program, Metropolitan Transportation Plan, Participation Plan, and Coordinated Public Transit-Human Services Transportation Plan. The Urban Transportation Advisory Board is a 13-member board having authority over transportation activities in the Metropolitan Planning Area. In addition to transportation planning for highways, transit, bicycle, pedestrians and freight, the Council develops plans and programs for other regional planning elements such as economic strategies, community development, air quality and rural transportation.

The Urban Transportation Advisory Board has two specific committees and several subcommittees to support the transportation planning activities. NIRCC partners with Region III-A Economic Development District and Regional Planning Commission on the development of a Comprehensive Economic Development Strategy (CEDS) through the oversight of the CEDS Committee.

Committees

NIRCC committees advise on specific regional issues while ensuring that all interested parties, including member governments and concerned citizens, have an opportunity to participate in the planning process. Meeting dates are published on the NIRCC website at www.nircc.com. Committee membership is achieved by appointment from an elected person, board or commission; commensurate with a specific elected position; or delegated to a specific position/job title. All committee meetings are open to the public.

Transportation Technical Committee (TTC) and Transit Planning Committee (TPC)

Associated with the UTAB are the Transportation Technical Committee and Transit Planning Committee that serve as working advisory committees. These committees are the agents through whom transportation planning information and analyses are channeled between state and local governments and NIRCC staff. The informational flow is bi-directional. The Transportation Technical Committee oversees the day-to-day coordination activities of state and local governments with primary regard to highways and roads. The Transit Planning Committee oversees the day-to-day coordination activities of state and local governments with primary regard to public transportation. Both committees work with other modes of transportation in relation to their respective areas. Similarly, there are occasions when these two committees work jointly on projects of mutual interest and concern.

The membership of these committees is composed of local government staff members authorized to provide planning information, offer comment, and report on transportation related activities within their agency's jurisdiction. State and federal officials participate on the committees and may hold voting or non-voting memberships. Duties and responsibilities of the Transportation Technical Committee and Transit Planning Committee include the following:

1. The Committees are responsible for obtaining specific planning information and data from local governments and for working with staff to integrate this information into the planning process as specified in the transportation elements of the Unified Planning Work Program. This activity may include information related to land use, terminal facilities, traffic control features, zoning ordinances, subdivision regulations, building codes, financial resources and others as necessary.
2. The Committees through their subcommittees deal with and provide recommendations regarding the Site-Plan and Driveway applications, feasibility studies, Section 5310, 5316 and 5317 grant applications, transit studies, etc.

3. The Committees through their subcommittees and meetings conduct coordination work activities regarding program implementation within the Metropolitan Planning Area.
4. With regard to the continuing phase of transportation planning, the Committees assist staff in developing the work elements of the various program components.

NIRCC collaborates with Region III-A Economic Development District and Regional Planning Commission (Region III-A) on the development of a Comprehensive Economic Development Strategy (CEDS). The CEDS is developed through the oversight and participation of the CEDS Committee.

Comprehensive Economic Development Strategy Committee

The CEDS Committee is comprised of locally elected and appointed officials, and representatives of education, private business, utilities and economic development groups. The CEDS Committee is responsible for the development and approval of the Comprehensive Economic Development Strategy (CEDS). The CEDS and CEDS Committee adhere to the guidelines and regulations of the US Department of Commerce, Economic Development Administration.

Policy Statement and Authorities

Title VI Policy Statement

The Northeastern Indiana Regional Coordinating Council assures that no person shall on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259), be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any agency-sponsored program or activity. Nor shall sex, age or disability stand in the way of fair treatment of all individuals. NIRCC further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

In the event that NIRCC distributes Federal aid funds to another entity, NIRCC will include Title VI language in all written agreements and will monitor for compliance. Title VI compliance is a condition of the receipt of Federal funds. NIRCC's Executive Director serves as the Title VI Compliance Manager and is authorized to ensure compliance with provisions of this policy and with the law, including the requirements of Title 23 Code of Federal Regulation (CFR) 200 and Title 49 CFR 21. NIRCC acknowledges its responsibility for initiating and monitoring Title VI activities, preparing required reports and other responsibilities as required by Title 23 CFR 200 and by Title 49 CFR 21.

Authorities

Title VI of the 1964 Civil Rights Act provides 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 receiving Federal financial assistance. The Civil Rights Restoration Act of 1987 broadened the scope of the Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients and contractors, whether such programs and activities are federally assisted or not.

Additional Citations

Other Title VI-related statutes include but are not limited to: 42 USC 4601 to 4655; 23 USC 324; DOT Order 1050.2A; EO 12250; EO 12898; EO 13166; 23 CFR 200; 23 CFR 1235; 28 CFR 35; 28 CFR 36; 28 CFR 41; 28 CFR 42, Subpart C; 28 CFR 50.3.

Organization and General Responsibilities

NIRCC's Executive Director is authorized to ensure compliance with provisions of NIRCC's policy of nondiscrimination and with the law, including the requirements of Title 23 CFR 200 and Title 49 CFR 21. DVRPC's grants compliance function and Title VI coordination shall be performed under the authority of the Executive Director.

Title VI Program Areas

These program areas from NIRCC's Unified Planning Work Program have been identified as applicable to Title VI regulations:

- Communications and Public Involvement
- Planning and Technical Services
- Consultant Contracts
- Human Resources, Education and Training

The Council's Title VI-related responsibilities fall into two main categories: "General Responsibilities," applicable to all Title VI Program Areas; and "Program Area Responsibilities" that are specific to each Title VI Program Area. It is important to note that communications, public involvement, planning, and technical services are interrelated - they have been treated separately for purposes of clarity and correspond to the Council's organization. For example, the Communications and Public Involvement Program Area applies to and affects the Council's Unified Planning Work Program as a whole, particularly NIRCC efforts and responsibilities related to planning, programming, and environmental affairs.

Title VI General Responsibilities

The following is a list of general Title VI Council responsibilities that are applicable to all four Title VI Program Areas. The Executive Director is responsible for ensuring that these elements of the

plan are appropriately implemented and maintained; Title VI Liaisons are responsible for implementing and maintaining these elements in their assigned Program Areas, as appropriate.

Data Collection

NIRCC will monitor data sources for updated statistical data on race, color, national origin, language spoken at home, income, age and other socioeconomic indicators within the metropolitan planning area and four-county region. Census data and American Survey data are the primary sources of this socioeconomic data. NIRCC will also conduct a voluntary survey (see appendix) during public information meetings and public hearings to monitor participation in such sessions. Information on gender, ethnicity, race, age and income is requested. The data gathering process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI program.

Review of Title VI Program and Program data

At a minimum, NIRCC will review the Title VI Program to assure compliance with the law and any associated regulatory requirements. This review will coincide with the Federal Certification Review conducted by the U.S. Department of Transportation. In addition, NIRCC will review its operational guidelines, documents and publications as appropriate, including those for contractors, to ensure that Title VI language and provisions are incorporated.

Dissemination of Information Related to the Title VI Program

Information on the Council's Title VI program is to be disseminated to staff, contractors, as well as to the public. The Title VI program documentation will be available for review at the NIRCC Office and is posted on the NIRCC website at www.nircc.com.

Complaints

Any individual may exercise his or her right to file a complaint with NIRCC, or have a legal representative file a claim on their behalf, if that person believes that she or he or any other program beneficiaries have been subjected to unequal treatment or discrimination on the grounds of race, color, national origin, income, sex, or disability in any program administered by NIRCC and /or its sub-recipients, consultants or contractors. NIRCC's Complaint Procedure is outlined in Appendix A including any current, pending or resolved Title VI complaints.

Responsibilities of Title VI Compliance Manager

The Title VI compliance responsibilities for the Council reside with the Executive Director. The Executive Director will manage the overall administration of the Title VI Program including complaint resolution and periodic review. Select staff will assist in the procurement of statistical data, survey data and review of the Title VI documentation. The Executive Director will provide information on the Title VI Program to Council staff and insure their compliance, discuss any compliance issues, periodically review Title VI program to assess if administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance, review important Title VI-related issues, log and forward all Title VI complaints received to the appropriate federal agency and assess communications and public involvement strategies to

ensure adequate participation of impacted Title VI protected groups and address additional language needs, as necessary.

Program Areas

Communications and Public Involvement

The goal of NIRCC communications process and Public Involvement Program is to ensure early and continuous public notification about, and participation in, major actions and decisions by the Council. In seeking public comments and reviews, NIRCC makes a concerted effort to reach all segments of the population, including people from minority and low-income communities, and organizations representing these and other protected classes. NIRCC utilizes a broad range of public information and participation opportunities, including dissemination of proposals and alternatives, a process for written comments, public meetings after effective notice, settings for open discussion, communication programs, information services, and consideration of and response to public comments.

NIRCC's Participation Plan was originally adopted in 1994 and most recently updated in 2025. The Participation Plan engages a philosophy that effective public involvement is a dynamic and ongoing process that is essential to meeting the future needs of all citizens in Northeast Indiana. We assert that good government cannot be achieved without the consideration, cooperation and consent of citizens throughout the region. We respect and promote the rich diversity that exists throughout this area. And further, we encourage opportunities to involve many and various audiences. Therefore, the Council commits to promote and sustain a responsive public participation program that supports citizen input and timely response at all levels of planning. The Participation Plan is provided in Appendix C.

NIRCC annually programs specific community participation activities in the Unified Planning Work Program to support communication, visualization, public meeting and information dissemination to citizens, businesses and other stakeholders in the planning process. Work activities to monitor socioeconomic data and Title VI mandates are ingrained in the planning activities and administered at the project or study level. NIRCC has also developed a plan and policy for engaging individuals with Limited English Proficiency (LEP). The Limited English Proficiency Plan is provided in Appendix D.

The NIRCC Participation Plan has several key components to ensure open and transparent decision-making procedures are incorporated in the planning process. These include: Board and Committee meetings open to the public; Public Information Meetings, Neighborhood Outreach Meetings and Public Hearings; Planning Briefs, Annual Summary Report and other published documents; Information Sharing and Assistance; Visualization Techniques and Activities; Website Management and document archiving; and News Media Involvement and Press Releases on major programs and projects. The specific activities for each of these components are documented in the Participation Plan. In addition, public comments are welcomed and encouraged at Board, Committee and Public information Meetings, and all Public Hearings.

Meetings Open to the Public

All NIRCC Board and Committee meetings are open to the public to attend. Meeting dates and times are posted in advance on the NIRCC website. Meeting notices and agendas are emailed to all interested parties. The Urban Transportation Advisory Board Meeting

Public Information Meetings, Neighborhood Outreach Meetings and Public Hearings

NIRCC schedules public information meetings for specific programs and projects. A distribution list with all known neighborhood representatives and other interested parties is maintained and utilized to notify area residents and stakeholders of scheduled meetings. NIRCC staff will participate in Area Partnership Meetings and attend public information meetings and public hearings specific to project development. As part of this effort, NIRCC will take the following steps:

- Plan meeting locations carefully – Public meetings should be held in locations that are accessible by public transit. Also, facilities should be compliant with the Americans with Disabilities Act (ADA). If a targeted population is in a certain geographic area, then the meeting location should be in that area for their convenience.
- Seek help from community leaders and organizations – To facilitate involvement of traditionally underserved populations, community leaders and organizations that represent these groups should be consulted about how to most effectively reach their membership. Relationships with these groups should be maintained for future partnerships in the planning process.
- Use alternative news organizations – In addition to mainstream media organizations, advertisements and news releases announcing public participation opportunities should be targeted to all media outlets.
- Provide services for disabled and LEP persons – Upon advance notice NIRCC will provide sign language interpreters, translators and modified documents for public meetings. Notifications of opportunities for public involvement will include contact information for people requesting accommodation.
- Sensitive to Title VI populations – At public meetings, staff will attempt to communicate as effectively as possible. Technical jargon should be avoided. For some meetings, it may be best to use trained facilitators or language translators to better communicate with the audience.

Projects sponsors also hold public information meetings and public hearings for specific programs and projects. Press releases, public notices and email notices are used to notify interested parties.

NIRCC staff periodically meets with Neighborhood groups to discuss planning activities and specific projects of interest.

Planning Briefs and Annual Reports

To reach the greatest number of people and groups, planning briefs provide an economical alternative to meetings. The briefs are sent to interested individuals and groups as well as to the local news media, governmental agencies, and elected officials. The annual report highlights the planning activities and provides information on the various studies conducted to support the planning process. The planning briefs and annual report are posted on the NIRCC web site.

Information Assistance

The NIRCC staff responds to requests for information pertaining to Council activities and programs from interested citizens and groups. Assistance is provided to interested individuals and groups upon request. Requests frequently involve information concerning transportation programs and improvement projects, residents and businesses request traffic data and transportation planning information through correspondence, visits to the office, and telephone conversations. The staff responds to these requests with the most accurate and timely information available.

Visualization Activities

The Council prepares visual aid presentations for civic and community groups as an educational tool to heighten public interest in the Council's transportation planning activities. Visualization techniques are developed and/or revised in-house as needed or located from other sources to be shown to interested local groups, civic organizations, and schools regarding different facets of the Council's work activities. These materials aid in the understanding and awareness of the Council's transportation activities.

Web Site-Access to World Wide Web

NIRCC maintains an extensive website at www.nircc.com that provides information on the transportation planning process and activities. The Plans, Improvement Programs and other planning documents are posted on the site and available for viewing. The site includes information on the Council's responsibilities, programs, publications; contact information; a calendar of events and meetings; NIRCC newsletters; Transportation Plans and other publications.

News Media and Media Releases

Media releases are routinely sent to all local media outlets, which include daily and weekly newspapers, TV stations, and radio stations. They are also directly e-mailed or faxed to individual reporters and other contacts throughout the metropolitan area. The media is contacted when new programs, projects and policies are ready for public input. Staff distributes background information or press releases and is available for media interviews. Public Information Officers for the area governmental agencies are also notified of any media release. News media are notified of scheduled NIRCC Board and Committee meetings.

Opportunities for Public Comment

NIRCC offers several different ways for people to comment on activities, programs and decisions made at the Council and related Boards and Committees. Comments are accepted at any time via phone, fax, e-mail, US mail, and in person at the NIRCC Offices, or at any Board, Committee or general Public Information Meeting. Public comments are requested at each Council and UTAB Meeting. All NIRCC Board and Committee meetings are open to the public to attend.

Formal public comment and review periods are used to solicit comments on major planning and programming activities such as the Transportation Improvement Program (TIP), Metropolitan Transportation Plan, major transportation improvement projects and changes to important NIRCC policies (such as the Public Participation Plan). Legal notices published in the major newspapers or emails are sent to all interested parties announcing comment periods. Comments are accepted in person at the corresponding NIRCC meeting, by e-mail, by US mail, fax, or telephone. NIRCC responds to all comments received, and forwards comments to other agencies for a response when appropriate.

Planning and Technical Services

NIRCC is responsible for developing long- and short- range plans to provide efficient transportation services that support local growth and sustainable practices in the four-county region. A comprehensive planning process is used, which entails the monitoring and collection of varied data pertaining to transportation, land use and environmental issues. NIRCC coordinates with the appropriate federal agencies, the state of Indiana, the counties and municipal governments, and seeks citizen input through public participation.

Unified Planning Work Program (UPWP)

A complete listing of all NIRCC projects and programs can be found in the Unified Planning Work Program (UPWP) which incorporates the planning programs and support activities of NIRCC and its member governments within the metropolitan area. The UPWP also contains the Small Urban and Rural Planning (SURP) program activities that are conducted in the non-metropolitan areas of the four-county region. The UPWP covers a two-year time period, with minor modification made on an annual basis. The SURP is updated annually. NIRCC in conjunction with its planning partners identify work activities to reflect federal, state and local policies that require specialized transportation planning activities. Federal laws and regulations require the formation of a Metropolitan Planning Organization (MPO) for each urbanized area with a population of more than 50,000 to facilitate a comprehensive, coordinated and continuing transportation planning program.

Transportation Improvement Program (TIP)

The Transportation Improvement Program (TIP), the agreed-upon list of transportation projects for the region, manages funding for the reconstruction, improvement, and expansion of the region's transportation system. The TIP lists all capital projects that are federally, and state funded. It includes traditional highway and public transit projects, as well as bicycle, pedestrian,

and freight-related projects. Required by federal law, the TIP is the culmination of a transportation planning process that represents a consensus among state and regional officials as to what improvements to pursue. The TIP shows estimated costs and schedules by project phase, including preliminary engineering, right-of-way acquisition, and construction. The TIP may be changed by the Urban Transportation Advisory Board after it is adopted. The TIP covers a four-year period and is updated every other year.

Metropolitan Transportation Plan

One of the most important documents prepared by NIRCC is the Metropolitan Transportation Plan (MTP) for the region. The MTP identifies transportation system investment to support the vision of the region's future growth and development as crafted in the comprehensive planning process. The MTP determines regional priorities for the implementation of future transportation facilities and services. The MTP provides guidance and direction for municipal, county and state agencies to make infrastructure investments; and serves as the foundation for developing the region's TIP. The MTP must maintain at least a twenty-year planning horizon. As the region's MPO, NIRCC has a mandated responsibility to determine how federal transportation funds will be spent. The MTP sets the framework and priorities for distribution of federal funds and ensures that recommended projects are consistent with defined long-term goals for the transportation system. MTPs are developed through an extensive public outreach effort and coordination among numerous federal, state and local agencies.

MTPs address land use, environmental, economic competitiveness and transportation policies, and include a set of fiscally constrained transportation projects. It reviews long-term and recent development trends and considers future land uses in accordance with the local Comprehensive Plans. The Comprehensive Plans, along with extensive public input, served as the basis for creating a regional vision to guide future development in the Metropolitan Area. The Plan includes a needs assessment for maintaining existing transportation infrastructure with limited new capacity expansion. Reasonably expected available revenue is used to constrain the identified need in the financial plan, including a list of major regional projects. To fully achieve the vision beyond the constrained Plan, the region needs to consider alternatives, such as local funding options or public-private partnerships. The Council identifies residential, employment and transportation patterns of Title VI populations so that their needs can be identified and addressed, and the benefits and burdens of transportation can be fairly distributed; and where necessary, improves the public involvement process to eliminate barriers and engage all interested parties in regional decision-making.

Air Quality

The Council recognizes its responsibility to preserve the quality of the air in the region. The Clean Air Act Amendments of 1990 require that federally supported highway and transit project activities must "conform to" state air quality goals. Allen County, Indiana, the principal county containing the metropolitan area, has been classified as a Maintenance Area for the pollutant ozone based on the 1997 National Ambient Air Quality Standards (NAAQS).

The U.S. Environmental Protection Agency (EPA) issued guidance to assist in the implementation of the February 16, 2018, decision from the United States Court of Appeals for the District of Columbia Circuit in *South Coast Air Quality Mgmt. District v. EPA* (“South Coast II,” 882 F.3d 1138). The guidance provides a process for how transportation conformity determinations can be made in areas such as Allen County that were classified as maintenance for the 1997 Ozone NAAQS when the standard was revoked. The 1997 Ozone Maintenance Area designation for Allen County will terminate on February 12, 2027.

While the Fort Wayne Metropolitan Area and Allen County have been found to conform to the 2008 National Ambient Air Quality Standards, NIRCC remains cognizant of its responsibility to improve air quality and promote efficient transportation system operations.

Coordinated Public Transit-Human Services Transportation Plan

The Coordinated Public Transit-Human Service Transportation Plan, as required by the Federal Transit Administration, includes existing regional non-traditional services, goals, and strategies for providing additional services to elderly, and disabled residents in the Fort Wayne Metropolitan Area. The Moving Ahead for Progress in the 21st Century eliminated the Section 5316 Job Access Reverse Commute (JARC) Program and combined the Section 5317 New Freedom program with Section 5310 Transportation for Elderly Persons and Persons with Disabilities Program into a new Section 5310 program titled “Enhanced Mobility of Seniors and Individuals with Disabilities.” The principles of each program will remain the same and all Section 5310 projects selected for funding must be “derived from a locally developed, coordinated public transit-human services transportation plan”, and that the plan be “developed through a process that includes representatives of public, private and nonprofit transportation and human services providers and participation by the public.”

Technical Assessment of Title VI Populations

The primary tenants of Title VI are to ensure that everyone has an opportunity to participate in and derive benefits from any program or activity performed or financed by NIRCC. The provisions of Title VI of the Civil Rights Act of 1964 and other statutes, orders, policies, and guidelines affect planning and project decisions undertaken by NIRCC, public transportation agencies, State Departments of Transportation (DOT), and other transportation providers.

NIRCC follows three fundamental principles when developing plans and projects that strive to avoid, minimize, or mitigate disproportionately high and adverse human health and environmental impacts including social and economic effects. Planning activities must ensure the full and fair participation by all potentially affected communities in the transportation; decision-making process to prevent the denial of, reduction in, or significant delay in the receipt of benefits.

The circumstances of policy and project implementation, and the degree of negative impacts that form the basis for Title VI challenges can be quite subtle. A more complete understanding requires the investigation and evaluation of "disparate impact" circumstances: "to prevent the denial of, reduction in or significant delay in the receipt of benefits by Title VI populations." This

kind of impact can include failure to act, as well as the relative degree or effects of a neutral action, regardless of the initial intentions or motivations. To address Title VI concerns, agencies must enhance their public involvement programs to "ensure the full and fair participation by all potentially affected communities in the transportation decision making process." This applies at the project level and should be institutionalized as part of the environmental assessment and impact statement process governed by the National Environmental Policy Act (NEPA) of 1969. Demographic analysis of the geographic area affected by a proposed project needs to be undertaken to determine the socioeconomic composition of the neighborhood or area, and whether there will be direct or disparate impacts on the defined groups. Mitigation or avoidance actions can then be proposed to ameliorate any potential negative impacts.

The Title VI populations are mapped by census block, or census tract based on whether they meet or exceed the regional average (the national guidelines from the Department of Health and Human Services are used for those in poverty). NIRCC monitors the following population groups including over the age of 65, minorities, Hispanic, below poverty level, disability, limited English proficiency, and households with no vehicle access. Based on these demographics, Title VI Tiers are mapped with Tier 1 representing areas that exceed regional averages for 6 or seven of the socio-economic variables, Tier 2 areas exceed 4-5 thresholds, and Tier 3 exceeds 2-3 thresholds.

Congestion Management Process (CMP)

The Congestion Management Process (CMP) and its related projects should not result in direct or disparate negative impacts to any Title VI population or specific socioeconomic group. In assessing the operational criteria for monitoring and evaluating the CMP network, criteria are based on area types as defined by land use characteristics with no regard to population or household characteristics. The distribution of the CMP corridors that comprise the network, are based on functionality as they relate to travel within and through the metropolitan area. As individual corridors are studied and potential strategies developed to mitigate congestion, evaluations will be needed to understand the potential impacts of existing and future conditions on any Title VI population and provide appropriate recommendations to address any concerns.

Technical & Data Services

Translating the meaning of demographic, economic and transportation system performance data into usable formats that can be interpreted for many purposes is a major function at NIRCC. The Council utilizes assorted collections and analyses of demographic and economic data from various sources, including the U.S. Census Bureau, STATS Indiana, American Community Survey and other sources. NIRCC maintains a considerable amount of data and operating characteristics on the regional transportation system. NIRCC also relies on several planning, economic development and research organizations for data and plans that include Land Use, Environmental Management, Employment Economic Indicators and other regional data and policy guidance.

Consultant Contracts

NIRCC is responsible for selection, negotiation, and administration of its consultant contracts. The Council operates under Allen County contract procedures and all relevant federal and state laws. NIRCC verifies Title VI compliance by consultants (sub-recipients of Federal funds) in the

contracting process. Signature of the terms of the contract is used to verify compliance on the part of the consultant. In addition, Title VI text is included in all NIRCC Requests for Proposals (RFPs). The current Contract Assurances are provided in Appendix E.

Disadvantaged Business Enterprise (DBE) Program

It is NIRCC's policy to encourage all qualified businesses to actively participate in the procurement of all NIRCC sponsored contracts. NIRCC does not discriminate based on race, color, sex, national origin, age, military status or disability.

DBE Program Description

It is NIRCC's policy to ensure that disadvantaged (DBE) and small (SBE) businesses, as defined in Part 26, have an equal opportunity to receive and participate in USDOT-assisted contracts. It is also the NIRCC's policy to:

- Ensure nondiscrimination in the award and administration of USDOT-assisted contracts;
- Create a level playing field on which DBE/SBEs can compete fairly for USDOT assisted contracts;
- Ensure that the DBE Program is narrowly tailored in accordance with applicable law;
- Ensure that only firms that fully meet 49 CFR, Part 26 eligibility standards are permitted to participate as DBEs;
- Help remove barriers to the participation of DBE/SBEs in USDOT-assisted contracts; and
- Assist the development of firms that can compete successfully in the marketplace outside the DBE Program.

Human Resources, Education and Training

Human Resources

NIRCC utilizes the Allen County Human Resources Department for recruiting, testing and Employee Policies. NIRCC, in conjunction with Allen County, is an Equal Opportunity Employer (EOE). Accordingly, we promote equal opportunity in areas of recruitment, employment, training, development, transfer, and promotion. Our employment practices are without regard to race, color, religion, creed, gender, age, disability or medical condition, national origin, and veteran status, and all other categories protected by federal, state, and local anti-discrimination laws. The County of Allen maintains the position of Equal Employment Opportunity Officer to facilitate Equal Employment Opportunity.

Education and Training

Minorities, women, veterans, individuals with a disability, and other individuals are protected by Title VI and federal and state anti-discrimination laws are provided with equal opportunity and fair treatment in all employment-related decisions, including opportunities for education and training.

Operational Guidelines

- At the time of hire Title VI policy education and literature is provided to all employees. New employees are provided with education literature at new employee orientation.
- To continuously improve the NIRCC's overall compliance posture, nondiscrimination training will be coordinated with INDOT, FTA and FHWA and made available to MPO staff on an ongoing basis to ensure up-to-date knowledge of Title VI and other nondiscrimination statutes.
- All MPO employees are encouraged to participate in professional development and training.
- All materials received by the agency on training and education opportunities are made available to all employees, which includes all information on federally funded training, such as courses provided by the National Highway Institute (NHI) and National Transit Institute (NTI). Under the category of education and training, Title VI responsibilities include:
 - Assisting in the distribution of information to NIRCC staff on training programs regarding Title VI and related statutes;
 - Ensure equal access to, and participation in, applicable courses for qualified NIRCC staff; and;
 - Track staff participation in Title VI and Environmental Justice courses.

Summary Title VI Process

The Northeastern Indiana Regional Coordinating Council values each individual's civil rights and wishes to provide equal opportunity and equitable service for the citizens of this state. As a recipient of federal funds, the Northeastern Indiana Regional Coordinating Council conforms to Title VI of the Civil Rights Act of 1964 (Title VI) and all related statutes, regulations, and directives, which provide that no person shall be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance from NIRCC on the grounds of race, color, or national origin. NIRCC further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, regardless of whether those programs and activities are federally funded.

The remainder of this document includes the following Appendices.

Appendix A - Complaint Process

Appendix B – Public Meeting/Public Hearing Survey

Appendix C – Contract Assurances

Appendix D – Supporting Documentation

Appendix E – Annual Goals and Accomplishments

Complaint Process

The Northeastern Indiana Regional Coordinating Council has established the following complaint procedure and process that meets Title VI requirements.

Discrimination Policy

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance. As Title VI prohibits discrimination on the basis of “national origin,” that the Supreme Court has interpreted to include language, Title VI requires providing equal access to services and benefits to those individuals with Limited English Proficiency (LEP). The rights of women, the elderly and the disabled are protected under related statutes.

Title VI prohibits the following actions for recipients of federal assistance. Recipients (hereinafter sometimes referred to as Recipient, Recipients, Subrecipients or Subrecipient) of federal assistance (either directly or through contractual means), on the grounds of race, color, or national origin shall not:

1. Deny a person the chance to participate as a member of a planning or advisory body that is an integral part of the program.
2. Provide a service or benefit to an individual that is inferior (either in quantity or quality) to that provided to others in the program.
3. Provide an individual with a service or benefit in a manner different from others under the program.
4. Address an individual in a manner that denotes inferiority because of race, color, or national origin.
5. Subject an individual to segregation in any manner related to the receipt of services or benefits under the program.
6. Subject an individual to separate treatment in any manner related to receiving services or benefits under the program.
7. Restrict an individual in any way in the receipt of any advantage or privilege enjoyed by others under the program.
8. Require different standards or conditions as prerequisites for accepting an individual into a program.
9. Deny an individual any service or benefit provided under the program.
10. Use criteria or methods of administration which have the effect of subjecting individuals to discrimination or operate to defeat or substantially impair the accomplishment of the objectives of the program.
11. Permit discriminatory activity in a facility built in whole or in part with federal funds.
12. Fail to provide service or information in a language other than English when significant numbers of potential or actual beneficiaries are of limited English speaking ability.

13. Fail to advise the population eligible to be served or benefited by the program of the existence of the program.
14. Subject an individual to discriminatory employment practices under any federally funded program whose object is to provide employment.
15. Locate a facility in any way that would limit or impede access to a federally funded service or benefit.

Complaint Procedure

As a recipient of federal financial assistance, the Northeastern Indiana Regional Coordinating Council has in place the following Title VI complaint procedure.

Submit complaint: Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation, from the Northeastern Indiana Regional Coordinating Council's administration of federally funded programs, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. Such complaint must be filed within 30 calendar days after the date the person believes the discrimination occurred.

Submit written complaints to:

Daniel S. Avery, Executive Director
Northeastern Indiana Regional Coordinating Council
200 East Berry Street, Suite 230
Fort Wayne, IN 46802

- 1) Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination and shall include the following information:
 - Name, address, and phone number of the Complainant.
 - A written statement of the complaint, including the following details:
 - (a) Basis of complaint (i.e., race, color, national origin or language, disability, religion, familial status, or retaliation).
 - (b) The nature of the incident that led the complainant to feel discrimination was a factor.
 - (c) A detailed explanation of the alleged discriminatory act(s).
 - (d) The date or dates on which the alleged discriminatory event or events occurred.
 - (e) If applicable, name(s) of alleged discriminating official(s).
 - Other agencies (state, local or Federal) where the complaint is also being filed (optional).
 - Complainant's signature and date.
- 2) Review and Response: Upon receipt of the Complaint, the NIRCC Executive Director shall appoint one or more staff as review officers to evaluate and investigate the

complaint. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to NIRCC's processes relative to Title VI and environmental justice, as appropriate.

The staff review officer(s) shall forward their recommendations to the NIRCC Board for concurrence. If the Board concurs, the Executive Director shall issue the NIRCC's written response to the Complainant. This response shall be issued no later than 30 calendar days after the date the Executive Director received the Complaint. If more time is required, the Executive Director shall notify the complainant of the estimated timeframe for completing the review.

- 3) **Appeal:** The Complainant may appeal the Executive Director's response to the Complaint by submitting a written appeal to the NIRCC Chair no later than 15 calendar days after receipt of the Executive Director's written response. A response to any appeals will be issued by the NIRCC Chair within 15 days of receipt.
- 4) **Submission of Complaint to the Indiana Department of Transportation:** If the Complainant is dissatisfied with the NIRCC's resolution of the Complaint, he or she may also submit a complaint to the Indiana Department of Transportation for investigation. In accordance with Chapter VII, Title VI Discrimination Complaints, of Federal Transit Administration Circular 4702.1A, such a complaint must be submitted within 180 calendar days after the date of the alleged discrimination. Chapter IX of the FTA Circular 4702.1A, which outlines the complaint process to the Department of Transportation, may be obtained online at <http://www.fta.dot.gov/>.

These procedures do not deny 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 that include punitive damages or compensatory remuneration for the complainant.

For more information, please contact Daniel Avery at 260-449-7309 or at dan.avery@co.allen.in.us.

Current and Pending Complaints

The Northeastern Indiana Regional Coordinating Council has not received any Title VI complaints.

Past Resolved Complaints

The Northeastern Indiana Regional Coordinating Council has not received any Title VI complaints.

Public Meeting/Public Hearing Survey

As a recipient of federal funds, the Indiana Department of Transportation (INDOT) is requiring local and regional agencies to develop a procedure for gathering statistical data regarding participants and beneficiaries of its federal-aid highway programs and activities (23 CRF §200.9(b)(4)). The Northeastern Indiana Regional Coordinating Council is distributing this voluntary survey to fulfill that requirement to gather information about the populations affected by proposed projects.

You are not required to complete this survey. Submittal of this information is voluntary. This form is a public document that the Northeastern Indiana Regional Coordinating Council will use to monitor its programs and activities for compliance with Title VI and the Civil Rights Act of 1964, as amended and its related statutes and regulations.

If you have any questions regarding the Northeastern Indiana Regional Coordinating Council's responsibilities under Title VI of the Civil Rights Act of 1964 or the Americans with Disabilities Act, please contact:

Daniel S. Avery, Executive Director
 Northeastern Indiana Regional Coordinating Council
 200 East Berry Street, Suite 230
 Fort Wayne, IN 46802

You may return the survey by folding it and placing it on the registration table or by mailing or e-mailing it to the address above.

Date (month, day, year)					
Project name					
Proposed project location					
Gender: <input type="checkbox"/> Female <input type="checkbox"/> Male		Ethnicity: <input type="checkbox"/> Hispanic or Latino <input type="checkbox"/> Not Hispanic or Latino			
Race: (Check one or more)					
<input type="checkbox"/> American Indian or Alaska Native		<input type="checkbox"/> Asian			
<input type="checkbox"/> Native Hawaiian or Other Pacific Islander		<input type="checkbox"/> White			
<input type="checkbox"/> Black or African-American		<input type="checkbox"/> Multiracial			
Age: <input type="checkbox"/> 1-21 <input type="checkbox"/> 22-40			Disability: <input type="checkbox"/> yes		
<input type="checkbox"/> 41-65 <input type="checkbox"/> 65+			<input type="checkbox"/> no		
Household Income:					
<input type="checkbox"/> 0-\$12,000		<input type="checkbox"/> \$12,001-\$24,000		<input type="checkbox"/> \$24,001-\$36,000	
<input type="checkbox"/> \$36,001-\$48,000		<input type="checkbox"/> \$48,001-\$60,000		<input type="checkbox"/> \$60,001+	

Contract Assurances

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

1. Compliance with Regulations

The Contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the U.S. Department of Transportation (hereinafter referred to as DOT), Title 49, Code of Federal Regulations, part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

2. Nondiscrimination

The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, sex, or national origin, age or disability in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in discrimination.

3. Solicitations for Subcontracts, Including Procurement of Materials and Equipment

In all solicitations either by competitive bidding or negotiations made by the Contractor for work to be performed under a subcontract, including procurement of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the Contractor of the Contractor's obligations under this contract and the Regulations relative to nondiscrimination on the ground of race, color, sex, or national origin.

4. Information and Reports

The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Northeastern Indiana Regional Coordinating Council, the Indiana Department of Transportation, or the Federal Highway Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information, the Contractor shall so certify to the Northeastern Indiana Regional Coordinating Council, the Indiana Department of Transportation, or the Federal Highway Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

5. Sanctions for Noncompliance

In the event of the Contractor's noncompliance with the nondiscrimination provisions of the contract, the Northeastern Indiana Regional Coordinating Council, with state and federal agency concurrence, would initiate sanctions per 49CFR.21.

Incorporation of Provisions

The Contractor shall include the provisions of items 1, 2, 4 and 5 as listed above in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontractor or procurement as the Northeastern Indiana Regional Coordinating Council or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, however, that in the event a Contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the Contractor may request the Northeastern Indiana Regional Coordinating Council enter into such litigation to protect the interests of the state and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the U.S.

That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with the Federal Aid Highway Program, and in adapted form in all proposals for negotiated agreements: " Northeastern Indiana Regional Coordinating Council, in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000d-42 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21: Nondiscrimination in Federally Assisted Programs of the Department of Transportation Issued Pursuant to Such Act, hereby notifies all bidders that it will affirmatively ensure that any contract entered pursuant to this advertisement will afford minority business enterprises full opportunity to submit bids in response to this invitation, and will not discriminate on the grounds of race, color, sex, or national origin in consideration for an award."

Supporting Documentation

NIRCC has strived to implement and conduct planning activities consistent with the spirit and requirements of Title VI provisions. In this effort NIRCC applies the Title VI protections to all aspects of its operations, programs, services and practices. To ensure NIRCC maintains staff expertise on the provisions of Title VI, staff regularly attend training sessions. NIRCC also works with other Local Public Agencies in the region assisting with their efforts for implementing Title VI.

Meeting/Open House	Date	NIRCC Staff	Title VI survey
TIP Open House	3/12/2025	hosted	0
TIP Open House	6/4/2024	hosted	0
MTP Open House	6/28/2023	hosted	0
TIP Open House	4/26/2023	hosted	5
TIP Open House	5/16/2022	hosted	0
TIP Open House	3/16/2021	hosted	2
TIP Open House - virtual	6-24-2020 to 7-8-2020	hosted online	0
TIP Open House	3/19/2019	hosted	0
TIP Open House	4/18/2018	hosted	0
TIP Open House	3/20/2017	hosted	0
TIP Open House	5/11/2016	hosted	1
TIP Open House	4/1/2015	hosted	0
TIP Open House	3/25/2014	hosted	5

Training	Date	NIRCC Staff
Navigating ADA (Allen County workshop)	1/29/2025	Stacey Gorsuch
INDOT ADA & Title VI training	8/1/2024	Dan Avery, Matt Peters, Stacey Gorsuch
Website Accessibility webinar	7/30/2024	Jody Feasel
ADA webinar	10/5/2023	Stacey Gorsuch
ADA webinar	6/30/2021	Stacey Gorsuch
Indiana ADA & Title VI Summit	1-5 & 1-6-2021	Stacey Gorsuch
INDOT Title VI & ADA training	10/11 & 12/2018	Dan Avery
INDOT Title VI & ADA training	10/11 & 12/2018	Stacey Gorsuch
INDOT Title VI & ADA training	5/26/2017	Dan Avery
INDOT Title VI & ADA training	5/26/2017	Stacey Gorsuch
INDOT Title VI & ADA training	5/25/2017	Stacey Gorsuch
ADA Advisory Group Mtg	5/3/2017	Stacey Gorsuch

ADA Advisory Group Mtg	9/22/2016	Stacey Gorsuch
FHWA Title VI training workshop	6/15/2016	Dan Avery
FHWA Title VI training workshop	6/15/2016	Stacey Gorsuch
INDOT Title VI training workshop	3/18/2016	Dan Avery
INDOT Title VI training workshop	3/18/2016	Stacey Gorsuch
INDOT Title VI training	11/18/2015	Dan Avery
INDOT Title VI training	9/16/2015	Dan Avery
INDOT Title VI training	9/16/2015	Stacey Gorsuch
INDOT Title VI training	9/18/2013	Dan Avery
INDOT Title VI training	9/18/2013	Stacey Gorsuch
ADA Advisory Group Mtg	1/9/2013	Dan Avery
ADA Advisory Group Mtg	1/9/2013	Stacey Gorsuch
ADA Training	9/14/2012	Stacey Gorsuch
ADA Training	8/28 & 29/2012	Matt Peters
ADA Training	8/28 & 29/2012	Stacey Gorsuch
ADA Workshop	7/25/2011	Dan Avery
ADA Workshop	7/25/2011	Matt Peters
ADA Workshop	7/25/2011	Stacey Gorsuch

Dissemination/Training of Title VI & ADA info

	Date	NIRCC Staff
NIRCC Staff	10/1/2024	Stacey Gorsuch
NIRCC Staff	11/10/2020	Stacey Gorsuch
Wells County ADA review	9/27/2023	Stacey Gorsuch
ADA meeting with AC	4/11/2022	Dan Avery, Stacey Gorsuch
ADA meeting for FW LPA	8/25/2021	Dan Avery, Stacey Gorsuch, Matt Peters, Matt Vondran, Stephen Senior
ADA meeting for AC LPA	8/11/2021	Dan Avery, Stacey Gorsuch
NIRCC Staff	11/10/2020	Stacey Gorsuch
ADA meeting for FW LPA	3/8/2019	Stacey Gorsuch
ADA meeting for FW LPA	10/16/2018	Stacey Gorsuch
NIRCC Staff	11/17/2017	Stacey Gorsuch
NIRCC Staff	11/16/2017	Stacey Gorsuch
NIRCC Staff	11/19/2015	Stacey Gorsuch
ADA meeting for FW LPA	10/21/2015	Stacey Gorsuch
ADA meeting for FW LPA	8/19/2015	Matt Peters
ADA meeting for FW LPA	8/19/2015	Stacey Gorsuch
ADA meeting for FW LPA	4/15/2015	Stacey Gorsuch
ADA meeting for FW LPA	2/18/2015	Stacey Gorsuch
ADA meeting for FW LPA	12/17/2014	Matt Peters

ADA meeting for FW LPA	12/17/2014	Stacey Gorsuch
ADA meeting for FW LPA	8/20/2014	Stacey Gorsuch
Email to NE Indiana LPAs	7/16/2014	Stacey Gorsuch
ADA meeting for FW LPA	4/16/2014	Stacey Gorsuch
ADA meeting for FW LPA	2/19/2014	Stacey Gorsuch
ADA meeting for FW LPA	12/18/2013	Stacey Gorsuch
ADA meeting for FW LPA	11/20/2013	Stacey Gorsuch
Email to NE Indiana LPAs	10/30/2013	Stacey Gorsuch
ADA meeting for FW LPA	10/23/2013	Stacey Gorsuch
ADA meeting for FW LPA	9/25/2013	Dan Avery
ADA meeting for FW LPA	9/25/2013	Stacey Gorsuch
Email to NE Indiana LPAs	9/19/2013	Stacey Gorsuch
ADA meeting for FW LPA	8/23/2013	Stacey Gorsuch
ADA meeting for FW LPA	7/17/2013	Stacey Gorsuch
ADA meeting for FW LPA	6/19/2013	Stacey Gorsuch
ADA meeting for FW LPA	5/15/2013	Stacey Gorsuch
ADA/PROWAG training for FW & AC	4/19/2013	Stacey Gorsuch
ADA meeting for FW LPA	4/17/2013	Stacey Gorsuch
ADA meeting for FW LPA	3/20/2013	Stacey Gorsuch

**Dissemination/Training of
Title VI & ADA info -
continued**

	Date	NIRCC Staff
ADA meeting for FW LPA	2/20/2013	Stacey Gorsuch
DeKalb County Commissioner Mtg	1/28/2013	Dan Avery
DeKalb County Commissioner Mtg	1/28/2013	Stacey Gorsuch
ADA meeting for FW LPA	1/16/2013	Dan Avery
ADA meeting for FW LPA	1/16/2013	Stacey Gorsuch
ADA meeting for FW LPA	12/12/2012	Dan Avery
ADA meeting for FW LPA	12/12/2012	Stacey Gorsuch
Wells County Commissioner Mtg	12/3/2012	Stacey Gorsuch
ADA meeting for FW LPA	11/29/2012	Stacey Gorsuch
Vera Cruz Town Council Mtg	11/19/2012	Dan Avery
Zanesville Town Council Mtg	11/15/2012	Dan Avery
Zanesville Town Council Mtg	11/15/2012	Stacey Gorsuch
Uniondale Town Council Mtg	11/13/2012	Dan Avery
Uniondale Town Council Mtg	11/13/2012	Stacey Gorsuch
ADA/PROWAG training for FW	11/13/2012	Stacey Gorsuch
Wells County Commissioner Mtg	11/6/2012	Stacey Gorsuch
Wells County Commissioner Mtg	11/4/2012	Dan Avery

Wells County Commissioner Mtg	11/4/2012	Stacey Gorsuch
ADA meeting for FW LPA	10/23/2012	Dan Avery
ADA meeting for FW LPA	10/23/2012	Stacey Gorsuch
Allen County Commissioner Mtg	10/22/2012	Dan Avery
Allen County Commissioner Mtg	10/22/2012	Stacey Gorsuch
ADA meeting for AC LPA	10/11/2012	Dan Avery
ADA meeting for AC LPA	10/11/2012	Stacey Gorsuch
Poneto Town Council Mtg	10/8/2012	Dan Avery
Poneto Town Council Mtg	10/8/2012	Stacey Gorsuch
Wells County Commissioner Mtg	10/1/2012	Dan Avery
Wells County Commissioner Mtg	10/1/2012	Stacey Gorsuch
Ossian Town Council Mtg	9/24/2012	Dan Avery
Ossian Town Council Mtg	9/24/2012	Stacey Gorsuch
ADA meeting for FW LPA	9/17/2012	Stacey Gorsuch
DeKalb County	8/27/2012	Dan Avery
DeKalb County	8/27/2012	Stacey Gorsuch
ADA meeting for FW LPA	8/10/2012	Stacey Gorsuch
ADA meeting for FW LPA	7/23/2012	Stacey Gorsuch
DeKalb County	7/11/2012	Dan Avery
DeKalb County	7/11/2012	Stacey Gorsuch
ADA meeting for FW LPA	6/27/2012	Stacey Gorsuch
ADA meeting for FW LPA	6/4/2012	Stacey Gorsuch
ADA/PROWAG meeting for AC, FW & NH LPAs	5/15/2012	Stacey Gorsuch
Wells County	4/16/2012	Dan Avery

**Dissemination/Training of
Title VI & ADA info -
continued**

	Date	NIRCC Staff
Wells County	4/16/2012	Stacey Gorsuch
DeKalb County	4/11/2012	Dan Avery
DeKalb County	4/11/2012	Stacey Gorsuch
ADA meeting for AC, FW & NH LPAs	4/10/2012	Dan Avery
ADA meeting for AC, FW & NH LPAs	4/10/2012	Stacey Gorsuch
PROWAG discussion for AC, FW & NH LPAs	3/29/2012	Dan Avery
PROWAG discussion for AC, FW & NH LPAs	3/29/2012	Stacey Gorsuch
Noble County	10/5/2011	Dan Avery
Noble County	10/5/2011	Stacey Gorsuch

**ADA Data Collection (for
Transition Plan)**

	Date	NIRCC Staff
Corunna	2024	Dan Avery & Stacey Gorsuch
Monroeville	2023	Alexis Degitz, Stacey Gorsuch
Allen County	3/30/2023	Alexis Degitz, Stacey Gorsuch
Allen County	2022-2023	Matt Peters, Alexis Degitz, Stacey Gorsuch
Allen County	8/11/2022	Dan Avery, Matt Peters, Stacey Gorsuch
Citilink Bus Stop Inventory	7/6/2022	Dan Avery, Matt Peters, Matt Vondran, Stephen Senior, Stacey Gorsuch
Citilink Bus Stop Inventory	2019	Dan Avery, Matt Peters, Matt Vondran, Stephen Senior, Stacey Gorsuch
Altona	7/12/2017	Stacey Gorsuch
St Joe	2013	Intern
Corunna	2013	Intern
Woodburn	2013	Intern
Leo/Cedarville	2013	Intern
Poneto	2012	Intern
Vera Cruz	2012	Intern
Uniondale	2012	Intern
Zanesville	2012	Intern
Wells County	2012	Intern
Bluffton	2012	Intern
Ossian	2012	Intern
Bluffton	10/29/2012	Stacey Gorsuch
Wells County	10/29/2012	Stacey Gorsuch
DeKalb County	10/25/2012	Stacey Gorsuch
DeKalb County	9/11/2012	Stacey Gorsuch
DeKalb County	5/16/2012	Dan Avery
DeKalb County	5/16/2012	Jerry Brown
DeKalb County	5/16/2012	Stacey Gorsuch
DeKalb County	5/16/2012	Hillary Bradtmiller

Date

NIRCC Staff

ADA Transition Plan

Corunna (update)	2024	Stacey Gorsuch
Monroeville	2023	Stacey Gorsuch
Woodburn update	2020	Stacey Gorsuch
Leo-Cedarville update	2019	Stacey Gorsuch
Altona	2018	Stacey Gorsuch
update of DeKalb County	2016	Stacey Gorsuch
St Joe	2013	Stacey Gorsuch
Corunna	2013	Stacey Gorsuch
Woodburn	2013	Stacey Gorsuch
Geneva	2013	Stacey Gorsuch
Leo/Cedarville	2013	Stacey Gorsuch
Poneto	2012	Stacey Gorsuch
Vera Cruz	2012	Stacey Gorsuch
Uniondale	2012	Stacey Gorsuch
Zanesville	2012	Stacey Gorsuch
Wells County	2012	Stacey Gorsuch
Bluffton	2012	Stacey Gorsuch
Ossian	2012	Stacey Gorsuch
Bluffton	2012	Stacey Gorsuch
DeKalb County	2012	Stacey Gorsuch

Annual Goals and Accomplishments

2025 Title VI Goals

- Update the Title VI Implementation Plan and Participation Plan.
- Identify and update website to have compliant pdf files.
- Update and provide new information on the Title VI and ADA webpages on the NIRCC website (in.gov/nircc).
- Title VI Coordinator attend in-person or online training.
- Encourage other staff to attend in-person or online training.
- Title VI and ADA training to NIRCC staff members.
- Strive for 0 Title VI and ADA complaints against NIRCC in 2025.

2026 Title VI Goals

- New website compliant with full accessibility
- Update and provide new information on the Title VI and ADA webpages on the NIRCC website (in.gov/nircc).
- Title VI Coordinator attend in-person or online training.
- Encourage other staff to attend in-person or online training.
- Title VI and ADA training to NIRCC staff members.
- Strive for 0 Title VI and ADA complaints against NIRCC in 2026.

2024 Title VI Accomplishments

- New website
- Accessibility for website (old & new websites as we transition)
- Title VI training to NIRCC staff members.
- Updated and organized Title VI and ADA webpages on the NIRCC website.