



**CITY OF GOSHEN BOARD OF PUBLIC WORKS & SAFETY
MINUTES OF THE SEPTEMBER 25, 2025 REGULAR MEETING**
Convened in the Goshen Police & Court Building, 111 East Jefferson St., Goshen, Indiana

Present: Mayor Gina Leichty, Mike Landis, Mary Nichols, Orv Myers and Barb Swartley
Absent: None

CALL TO ORDER: Mayor Leichty called the meeting to order at 4:00 p.m.

REVIEW/APPROVE MINUTES: No minutes were available to review/approve.

REVIEW/APPROVE AGENDA: Mayor Leichty presented the agenda as prepared by Clerk-Treasurer Aguirre with an added item from Building Department – #13 Yaw Construction Inc. request: *Approve use of parking spaces downtown to complete the filling in of basement vaults.* Board member Mary Nichols made a motion to approve the agenda as amended. Board member Orv Myers seconded the motion. The motion passed 5-0.

1) Downtown Goshen Inc. requests: Approve a street and alley closure and the use of the west and east sides of the Art Alley for the First Friday Harvest Fest on Oct. 3

On behalf of First Friday Inc., Neil King, Director of Marketing for Eyedart Creative Studio, requested street and alley closures for the First Friday Harvest Fest on Oct. 3, which will be in collaboration with the City of Goshen's Indigenous Peoples' Day Celebration.

King asked for the closure of the half block of East Washington Street, from 5th Street to the alley, and access to and closure of the alley next to Electric Brew, 118 East Washington St. In addition, he requested use the Art Alley on both the west and east sides of Main Street for a vendor pop-up area. King said affected businesses have been informed of the closures and organizers requested barricades for the closures.

The closures will start at 3 p.m. and end at 9 p.m. on Oct. 3.

Nichols/Myers made a motion to approve closure of the half block of East Washington Street, from 5th Street to the alley, and closure of the alley next to the Electric Brew and use the Art Alley, on both the west and east sides of Main Street, on Oct. 3 from 3 to 9 p.m. The motion passed 5-0.

2) Lacasa request: Approve the temporary closure of the south eastbound lane, parking spaces and sidewalk in front of The Hattle Building, 210 E. Lincoln Ave., from Monday, Oct. 6, through Saturday, Oct. 11, 2025 to ensure the safety of contractors during the installation of a new water supply line

Brad Hunsberger, Senior Vice President for Real Estate Development for Lacasa, requested the closure of the south eastbound lane, parking spots and sidewalk in front of The Hattle Building, 210 E. Lincoln Ave., from Monday, Oct. 6, 2025, through Saturday, Oct. 11, 2025. He said the closure is necessary to ensure the safety of contractors during the installation of a new main water supply line to the building.

In a written request, Lacasa staff requested closure for the full week to account for potential weather-related delays. To ensure compliance with safety regulations, Lacasa obtained a certified traffic control plan from a traffic engineer, David H Boruff, dated September 2022, pursuant to Indiana Department of Transportation guidelines for short or intermediate-term stationary lane closure on three-lane roads. The traffic control plan outlined required safety measures, including the placement of appropriate signage. Directional signs will be placed at 5th Street and 6th Street, instructing pedestrians to cross at those intersections and notifying drivers of the lane closure.

City Engineering Project Manager Andrew Lund said Lacasa will need signage directing motorists around the closure area. Hunsberger said a contractor will provide the signage.



Nichols/Myers made a motion to approve the temporary closure of the southeast bound lane and the parking spots and sidewalk in front of The Hattle Building, located at 210 East Lincoln Ave., from Monday, Oct. 6 through Saturday, Oct. 11 for work by Lacasa.

City Director of Public Works & Utilities Dustin Sailor said Lacasa's final plan for the work and closure needed to be submitted to the City Engineering Department for approval before it was implemented.

Board member Nichols then amended her motion to make approval contingent on final approval of the plan by the Engineering Department. The motion then passed 5-0.

3) Unique Siding Co. request: Approve the temporary closure of the sidewalk in front of GoDance Building, 113 E. Lincoln Ave., and the adjacent alley, from Oct 20-24, 2025

Lynn McCullough of Unique Siding Co. said his company would be installing window trim for a project the Board has already approved.

McCullough requested temporarily closing the sidewalk in front of GoDance Building, 113 East Lincoln Ave., from Oct 20-24, 2025, in conjunction with work being done by Derstine Painting Plus+. In addition, he requested the alley be closed at Lincoln as two of the windows are on the alley side of the building.

McCullough said this closure is necessary to use a lift to ensure the safety of our workers and the public for work on the exterior trim with formed aluminum on the second story of the building after the installation of replacement windows by Derstine Painting Plus+.

McCullough said he would provide appropriate signage, cones, and caution tape and ensure continued access for emergency services and any affected residents, tenants and customers of GoDance, as needed. He added that all required safety and compliance measures will be followed.

Nichols/Myers made a motion to approve the temporary closure of the sidewalk in front of the GoDance Building, 113 East Lincoln Ave., as well as the alley at Lincoln, from Oct. 20 through Oct. 24, 2025. The motion was passed 5-0.

4) Legal Department request: Approve a contract for the 2025-2026 Cold Water Meter Testing Project with Vanguard Utility Service, Inc.

Shannon Marks, the Legal Compliance Administrator for the City Legal Department, said proposals were solicited for the 2025-2026 Cold Water Meter Testing Project. A summary of the proposals received for this service were attached to the Board's agenda packet.

Marks recommended that the Board approve and authorize the Mayor to execute the attached contract with Vanguard Utility Service, Inc. for this project. Payment to the contractor for work satisfactorily performed will be based on the established unit prices for the evaluation and testing of each meter size and the actual quantity for each meter size evaluated and tested. Additional work will also be based on the established unit prices for actual work satisfactorily performed and/or actual parts replaced.

Nichols/Myers made a motion to approve and authorize the Mayor to execute the Contract with Vanguard Utility Service, Inc. for the 2025-2026 Cold Water Meter Testing Project. The motion passed 5-0.

5) Legal Department request: Approve and authorize Mayor Leichty to execute the agreement and addendum with Abernethy Schwartz LLC dba BlueConduit to allow the City to participate in their no-cost customer beta program for water main intelligence solution

Assistant City Attorney Don Shuler recommended that the Board approve and authorize Mayor Leichty to execute the attached Agreement and Addendum with Abernethy Schwartz LLC dba BlueConduit to allow the City to participate in their no-cost customer beta program for water main intelligence solution, which is more particularly described in Appendix 1 – Customer Requirements & Scope of Work attached to Contractor's Agreement.



Shuler said there is no cost for the City to participate in the aforementioned customer beta program.

According to the agreement, BlueConduit has developed a new predictive modeling product to assess the probability of failure for a water system's distribution water mains. BlueConduit wants to provide the City with the output from the product in the City's Esri GIS environment for the purpose of beta testing and providing feedback on its accuracy and performance, functionality, and potential improvements.

In response to questions from the Mayor about whether this agreement was reviewed by the Technology Department and its safety, City Director of Public Works & Utilities Dustin Sailor said it has been reviewed and the City expects to benefit from this agreement. He said this will help evaluate water main conditions and predict mains that need to be replaced to prevent future breaks.

Board member Landis asked if the City might pay for this service in the future. Sailor said that would be a possibility, adding that the program "should consume new data as it comes in and then continuously adjust its model based upon the new data."

In response to a question from the Mayor, Sailor said the company would own the data collected and that the city would just be participating as a user. Still, he added that the City would benefit from the agreement.

Nichols/Myers made a motion to approve and authorize Mayor Leichty to execute the Agreement and Addendum with Abernethy Schwartz LLC dba BlueConduit to allow the City to participate in their no-cost customer beta program for water main intelligence solution, which is more particularly described in Appendix 1 – Customer Requirements & Scope of Work attached to Contractor's Agreement. The motion passed 5-0.

6) Legal Department request: Approve Resolution 2025-25 to approve two Lease Agreements and a License Agreement Between Elkhart County and the City Of Goshen. One lease agreement will provide space for the Goshen City Court to occupy a portion of the historic Elkhart County Courthouse, the second lease agreement will allow the City Fire Department administration to occupy another portion of the Courthouse and the City will allow Elkhart County to occupy certain fiber optic conduit located within downtown Goshen. Assistant City Attorney Don Shuler said attached to the agenda packet for the Board's consideration and approval was Resolution 2025-25, To Approve Two Lease Agreements and a License Agreement Between Elkhart County and the City Of Goshen.

Shuler said one lease agreement provides space for the Goshen City Court to occupy a certain portion of the historic Elkhart County Courthouse and one lease agreement allows the City Fire Department administration to occupy another portion of the historic Elkhart County Courthouse. Also, the City will allow Elkhart County to occupy certain fiber optic conduit located within downtown Goshen.

Under the agreements:

- For the Goshen City Court, the City will rent the space currently occupied by Elkhart County Superior Court IV, including the Courtroom, Judge's office space, Court Clerk's offices, and common spaces, being approximately 4,868 square feet in gross area.
- The term of this lease will be for a period of 59 months, commencing on Oct. 1, 2025, and continuing to Aug. 31, 2030, unless otherwise terminated.
- The City will pay Elkhart County \$1,000 per month, payable in advance, for the first year of this agreement with the rent increasing by 3% each year, commencing on the anniversary date of this agreement.
- In addition to the rent, the City agrees that as additional consideration for this agreement, it will execute, simultaneous with this agreement, a separate perpetual, permanent, and irrevocable license to allow Elkhart County the right to use the conduit depicted in red on a map attached to the agreement to pull and maintain up to a 288 strand fiber cable to be owned, maintained, and replaced as necessary by Elkhart County.



- The City agrees the leased premises will be used only to conduct all Goshen City Court operations, including scheduled City court hearings, office space for City Court Judge and staff, receiving payment from individuals who are paying fines, meetings with probation officers, and other activities necessary for Goshen City Court operations.
- For the City Fire Department administration, the City will rent space at the south end of the second floor of the Elkhart County Courthouse, currently occupied by the Elkhart County Clerk.
- County Commissioners will retain possession and control of the room labeled "County Storage" on the Floor Plan ... and will be entitled to access such room from the stairway of the building at any time, or from the north entrance of the leased premises during normal business hours and after hours.
- The City is entitled to use of the space labeled "Training Room" on the attached Floor Plan, at reasonable times when such room is not being used or otherwise scheduled for use. If the City wishes to use the Training Room, it must first reserve its use of such room with the Commissioners, or the Commissioners' designee.
- The term of this lease will be for a period of 59 months, commencing on Oct. 1, 2025, and continuing to Aug. 31, 2030, unless otherwise terminated.
- The City will pay Elkhart County \$1,500 per month, payable in advance, for the first year of this agreement with the rent increasing by 3% each year, commencing on the anniversary date of this agreement.
- In addition to the rent, the City agrees that as additional consideration for this agreement, it will execute, simultaneous with this agreement, a separate perpetual, permanent, and irrevocable license to allow Elkhart County the right to use the conduit depicted in red on a map attached to the agreement to pull and maintain up to a 288 strand fiber cable to be owned, maintained, and replaced as necessary by Elkhart County.
- The City agrees the leased premises leased will be used only for the Goshen Fire Department administrative offices and all other activities reasonably related to the operation of such offices.
- The City will grant to the County a perpetual, permanent, and irrevocable license to use the City Conduit to pull and maintain, up to a 288 strand, fiber cable ("County Fiber"). Licensee is solely responsible to maintain and replace, as necessary, the County Fiber. Lessor and Licensee agree that County may remove the County Fiber for any period of time without relinquishing its rights under this License.
- Elkhart County hereby expressly disclaims any and all liability for damage to the personal property in the Leased Premises. The City must indemnify and hold harmless Elkhart County against all costs and expenses and/or liability arising out of or based upon any claim accident or injury resulting from the City's use of the Property or occupancy of the Leased Premises.
- The City further agrees to maintain in full force and effect during the term of this Agreement a policy of liability insurance on the premises in a minimum amount of \$1,000,000 per occurrence, subject to an amount not less than \$2,000,000 aggregate limit covering bodily injury (including death), personal injury, property damage including, without limitation, all contractual liability for such injury or damage assumed by City under this Agreement (this policy must cover, but is not limited to, liability arising from premises and operations, independent contractors, Goshen City Court operations, personal and advertising injury, and blanket contractual liability). the City agrees to keep on deposit at all times during the term of this Agreement a certificate of proof issued by an insurance carrier that such insurance is in full force and effect and that Elkhart County is a named additional insured. Each certificate shall require that written notice be given to Elkhart County at least thirty (30) days prior to the cancellation or a material change in the policy.

Clerk-Treasurer Aguirre asked about the provisions in the agreement that the City provide insurance for the old Courthouse facilities. He asked where the funds would come from to pay for that. Mayor Leichty said he presumed the funds would come from the Board of Works. Aguirre said he was asking because this had not been discussed with him and he would be meeting Friday with the City's insurance agent.



Nichols/Myers made a motion to approve Resolution 2025-25, to Approve Two Lease Agreements and a License Agreement Between Elkhart County and the City Of Goshen. The motion passed 5-0.

7) Community Development requests: Approve and authorize the Mayor to sign the CBDO and CDBG agreements for Planning, Public Services and Housing activities for Program Year 2025

Community Development Specialist Theresa Cummings asked the Board to approve and authorize the Mayor to sign the following Community Development Block Grant (CDBG) agreements and Community Based Development (CBD) Organization agreement for Program Year 2025:

Public Service Grants:

Boys and Girls Clubs of Elkhart County – Goshen Club	\$5,125
Council on Aging of Elkhart County	\$5,125
Elkhart County Clubhouse	\$4,100
Goshen Interfaith Hospitality Network	\$19,500
Maple City Health Care Center, Inc.	\$5,125
Walnut Hill Early Childhood Center	\$10,250

Housing Grants:

Owner Occupied Rehab - Lacasa, Inc.	\$68,000
Homeownership Assistance – Lacasa, Inc.	\$50,750
Housing Counseling – Lacasa, Inc.	\$1,000
Energy Conservation Multi Family Rehab – Lacasa, Inc. (CBDO)	\$112,172
Planning, Public Service, and Housing Grants Total	\$343,147

Cummings said the planning grant will be used for neighborhood outreach. The public service grants will be used to fund access to early childhood education, daily nutrition programs, mental health support, senior transportation, and primary healthcare. The housing grants will be used to fund the ongoing owner-occupied housing rehab program, homeownership assistance accompanied by housing counseling, and a CBDO project for solar improvements to 12 affordable multi-family housing units

Nichols/Myers made a motion to approve and authorize the Mayor to sign the CBDO and CDBG agreements for Planning, Public Services and Housing activities for Program Year 2025. The motion passed 5-0.

8) Community Development request: Acknowledge the Uniform Conflict of Interest Disclosure by Jeffery Weaver, a Lacasa employee, City consultant and former City Deputy Clerk-Treasurer

Community Development Specialist Theresa Cummings said that former Deputy Clerk-Treasurer Jeffery Weaver has entered into a temporary agreement with the City of Goshen to serve as a consultant during the 2026 budget process. He also started in a position as a Real Estate Financial Analyst for Lacasa of Goshen as of Sept. 15, 2025. Lacasa is a subrecipient and CBDO of Community Development Block Grant (CDBG) funds for Program Year 2025. And in the interest of full transparency, Weaver is disclosing his service relative to Lacasa and the City.

Cummings said Weaver has agreed that in his role as a City consultant he is explicitly forbidden from discussing with any agent of the City matters related to, programs funded by the Department of Housing and Urban Development. Weaver has explicitly agreed that he will be unable to interact with any claims or vendors that are tied to Lacasa or CDBG and before the transition he assigned CDBG bank reconciliation duties over to Clerk-Treasurer Aguirre in order to avoid a perceived conflict of interest.

Cummings said public disclosure and application to HUD for a waiver are required under the regulations which govern the CDBG program. This disclosure will be done annually, as long as Weaver is serving in both capacities as City Consultant and an employee of Lacasa.



Cummings said this annual disclosure is to cover Sept. 15, 2025 through Jan. 31, 2026, when Weaver's consultant contract ends. The disclosure is attached, to be acknowledged by the Board of Public Works and Safety.

Aguirre said he wanted to state for the record that the agreement that the Board approved for Weaver to serve as a consultant for the City specifically stated that Weaver would not be working on matters related to Lacasa. Also, before he started work, Weaver provided a supplementary statement further restating that provision and adding more detail about matters he would not work on, so that also is on file with the Clerk-Treasurer.

Nichols/Myers made a motion to acknowledge the Uniform Conflict of Interest Disclosure for Jeffery Weaver. The motion passed 5-0.

9) Community Development request: Adopt the 2026 ADA Transition Plan Update and the 2026 Title VI Implementation Plan and grant permission for Mayor Leichty to sign the official Assurance documents, acknowledging both as essential frameworks for federal compliance, equity, and community accessibility City Redevelopment Director Becky Hutsell asked the Board to formal adopt the 2025 Americans with Disabilities Act (ADA) Transition Plan Update and the 2025 Title VI Implementation Plan.

Hutsell said when the packet was circulated Tuesday, City staff did not have all the appendices in place, which include resolutions, previous approvals, and other documents. So, today Hutsell provided:

- The Title II/ADA Transition Plan, September 2025, a 61-page document (EXHIBIT #1)
- The Title VI Implementation Plan, September 2025, a 48-page document (EXHIBIT #2)

Hutsell also said the City Legal Department prepared two resolutions for the Board to pass:

- Goshen Board of Public Works & Safety Resolution 2025-26, Adopting the 2025 City of Goshen Title II – Americans with Disabilities Act Transition Plan (EXHIBIT #3)
- Goshen Board of Public Works & Safety Resolution 2025-27, Adopting the 2025 City of Goshen Title VI Implementation Plan (EXHIBIT #4)

In summary, Hutsell said both the ADA Transition Plan and the Title VI Implementation Plan are federally mandated requirements for municipalities that receive federal financial assistance. She described the plans as follows:

- ADA Transition Plan: Required under the Americans with Disabilities Act of 1990, this plan outlines the City's efforts to identify and remove barriers to accessibility in public facilities, infrastructure, and programs. It demonstrates our ongoing commitment to ensure equal access for all individuals, regardless of ability.
- Title VI Implementation Plan: Required under Title VI of the Civil Rights Act of 1964, this plan ensures that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any City program or activity receiving federal funds, on the basis of race, color, or national origin.

Together, Hutsell indicated these plans provide a framework for compliance, accountability, and inclusivity in City operations. While adoption is a federal requirement, the City of Goshen recognizes this as an opportunity for continuous improvement. Over the coming year, City staff will:

- Conduct an in-depth review of both plans to refine processes and strengthen compliance measures.
- Provide additional training for City staff to increase awareness, consistency, and accountability.
- Work toward becoming more inclusive and accessible in all programs, facilities, and community engagement efforts.

Hutsell said the City has established a Task force for Community Accessibility, comprised of staff members from Engineering, Buildings & Grounds, the Mayor's office and Legal, to provide support and perspective in this process. This Task force will work closely with the Human Resources Director, who serves as the acting coordinator for both the ADA Transition Plan and the Title VI Implementation Plan. Hutsell said their collaborative efforts will ensure stronger oversight, meaningful engagement, and measurable progress toward inclusivity and accessibility goals. Hutsell said the Title VI plan is something that has to be done annually, so the City intends to continue moving forward with that. She said the ADA plan will be updated every other year.



Hutsell asked the Board to approve Resolution 2025-26, which is the approval for the ADA plan, as well as Resolution 2025-27, for the Title VI Implementation Plan.

Mayor Leichty expressed appreciation to City Engineering Project Manager Andrew Lund and City Redevelopment Director Becky Hutsell for working so hard on these documents. She said, "I know there were many late hours put in to complete this by the deadline that was needed, and I just appreciate all of your hard work to accomplish this herculean task. It's important work for the City, and I just want to make sure you get the recognition you deserve."

Nichols/Myers made a motion to approve Resolution 2025-26, Adopting the 2025 City of Goshen Title II – Americans with Disabilities Act Transition Plan, and allow Mayor Leight to sign the official Assurance documents, and to approve Resolution 2025-27, Adopting the 2025 City of Goshen Title VI Implementation Plan, and allow the Mayor to sign to sign the official Assurance documents. The motion passed 5-0.

10) Water Treatment & Sewer Collection Department public announcement: The Fall Hydrant Flushing Program will begin Monday, Sept. 29 and continue through Friday, Oct. 3, 2025, weather permitting
Kyle Weldy, the City Water Quality Manager, informed the Board that Goshen Utilities will start the fall hydrant flushing program beginning Monday, Sept. 29 through Friday, Oct. 3, 2025, weather permitting.

Weldy said from Sept. 29 through Oct. 3, City crews we will be flushing during daylight hours from 8:30 a.m. to 3:30 p.m. in the upper pressure zone, which is everything northeast of U.S. 33 and the Norfolk Southern tracks.

Night-time flushing from 9 p.m. to 6 a.m. will take place as follows:

Monday, Sept. 29, on Madison and 10th streets, heading south to the City limits and between the Norfolk Southern tracks and U.S. 33 to the City limits south.

Tuesday, Sept. 30, between Cottage Avenue and 10th Street from the Norfolk Southern tracks south to the city limits; between Lincolnway East and the Norfolk Southern tracks east to the city limits.

Wednesday, Oct. 1, between Pike Street and the City limits south; between North Greene Road and Cottage Avenue.

Thursday, Oct. 2, between Norfolk Southern and the City limits south; between North Greene Road and the city limits west.

In a memo to the Board, City staff advised residents to avoid doing laundry on the day City crews are close to their homes, due to the rust that crews are removing from water mains. If residents have a problem with their laundry, they can call the Utilities Office at 574-534-5306 and they will be provided special soap to use to remove discoloration. City residents can go to the city's website, type in their addresses on an interactive map and learn when work will take place in their neighborhoods.

Mayor Leichty thanked team members for their work.

There was no Board action because this was an information-only item.

13) Yaw Construction Inc. request: Approve use of six parking spaces downtown on Sept. 26, 2025 to complete filling in of three basement vaults

On behalf of Yaw Construction Inc., City Building Commissioner Myron Grise requested two parking space closures each in front of the following businesses: 201 South Main Street, 211 South Main Street and 213 South Main Street. Grise said this request was for Friday, Sept. 26 at 10 a.m. to complete footers in basement vaults at the three locations previously specified.

Mayor Leichty said she was glad to see this work progressing.

Grise said, "The walls will be coming, but we still haven't finished everything up on that so that they can be bid out yet. That's coming soon."



In response to a question from Board member Landis, Grise clarified the locations of the work and duration of the parking space closures. Grise added, "I was up there this morning, and we talked to all the businesses ... It shouldn't take more than a couple hours, Yaw is thinking, because it's just for the footers in the basement."

City Engineering Project Manager Andrew Lund raised a question about the safety of pedestrians. Grise responded, "I'll make sure that the sidewalks are blocked off a little bit, too, because there'll be pouring concrete."

Nichols/Myers then made a motion to approve the closure of two parking spaces in front of 201 South Main Street, as well as two parking spaces in front of 211 and 213 South Main Street on Friday, Sept. 26, 2025. The motion passed 5-0.

Privilege of the Floor (opportunity for public comment for matters not on the agenda):

Mayor Leichty opened Privilege of the Floor at 4:32 p.m. There were no comments.

APPROVAL OF CIVIL & UTILITY CLAIMS

Mayor Leichty made a motion to approve Civil City and Utility claims and adjourn the meeting. Board member Nichols seconded the motion.

ADJOURNMENT

Mayor Leichty adjourned the meeting at 4:33 p.m. Board member Landis said he agreed.

EXHIBIT #1: *The City of Goshen Title II/ADA Transition Plan, September 2025, a 61-page document which was presented to the Board of Public Works and Safety during consideration of agenda item #9, Community Development request: Adopt the 2026 ADA Transition Plan Update and the 2026 Title VI Implementation Plan and grant permission for Mayor Leichty to sign the official Assurance documents, acknowledging both as essential frameworks for federal compliance, equity, and community accessibility.*

EXHIBIT #2: *The City of Goshen Title VI Implementation Plan, September 2025, a 48-page document which was presented to the Board of Public Works and Safety during consideration of agenda item #9, Community Development request: Adopt the 2026 ADA Transition Plan Update and the 2026 Title VI Implementation Plan and grant permission for Mayor Leichty to sign the official Assurance documents, acknowledging both as essential frameworks for federal compliance, equity, and community accessibility.*

EXHIBIT #3: *Goshen Board of Public Works & Safety Resolution 2025-26, Adopting the 2025 City of Goshen Title II – Americans with Disabilities Act Transition Plan, which was approved by the Board during consideration of agenda item #9, Community Development request: Adopt the 2026 ADA Transition Plan Update and the 2026 Title VI Implementation Plan and grant permission for Mayor Leichty to sign the official Assurance documents, acknowledging both as essential frameworks for federal compliance, equity, and community accessibility.*



EXHIBIT #4: *Goshen Board of Public Works & Safety Resolution 2025-27, Adopting the 2025 City of Goshen Title VI Implementation Plan, which was approved by the Board during consideration of agenda item #9, Community Development request: Adopt the 2026 ADA Transition Plan Update and the 2026 Title VI Implementation Plan and grant permission for Mayor Leichty to sign the official Assurance documents, acknowledging both as essential frameworks for federal compliance, equity, and community accessibility.*

EXHIBIT #5: *A one-page letter, dated Sept. 25, 2025, and distributed to the Board of Public Works & Safety from Kerry E. Yaw of Yaw Construction Inc. requesting the closure and use of six downtown parking spaces on Sept. 26, 2025 during work to complete the filling of basement vaults at three locations. The letter was presented by City Building Commissioner Myron Grise. The request was approved.*

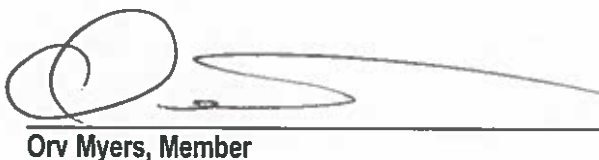
APPROVED:



Mayor Gina Leichty



Mike Landis, Member



Orv Myers, Member



Mary Nichols, Member




Barb Swartley, Member

ATTEST:

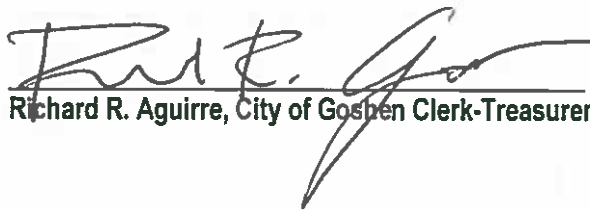

Richard R. Aguirre, City of Goshen Clerk-Treasurer

Exhibit #1



Title II / ADA Transition Plan

September 2025

INTRODUCTION

The Americans with Disabilities Act (ADA), enacted on July 26, 1990, and amended effective January 1, 2009, is a landmark civil rights law that prohibits discrimination against individuals with disabilities. Under Title II, state and local governments are required to ensure that individuals with disabilities are not excluded from participation in, or denied the benefits of, services, programs, or activities offered by those entities.

To comply with Title II, local governments must develop ADA Transition Plans. The purpose of this plan is to ensure the City of Goshen provides reasonable and accessible paths of travel within the public right-of-way, at government facilities, and across City programs—thereby promoting accessibility for all residents, including those with disabilities. The City of Goshen is committed to achieving long-term improvements in accessibility. This Transition Plan outlines identified physical barriers, prioritizes citywide improvements, and describes existing City policies and programs that support accessibility enhancement.

LEGAL FRAMEWORK & COMPLIANCE

The ADA provides comprehensive civil rights protections to individuals with disabilities across employment, state and local government services, public accommodations, transportation, and telecommunications.

Title II specifically applies to public entities, including state and local governments. It requires that all programs, services, and activities be accessible. According to Title II, Article 8, a Transition Plan must include:

1. A list of physical barriers in public facilities that limit accessibility.
2. A detailed outline of methods for removing these barriers.
3. A schedule for barrier removal; and
4. The name of the official responsible for implementing the plan.

Prior to developing a Transition Plan, public entities must complete an inventory of existing sidewalks and curb ramps. These inventories serve as the foundation for planning and executing ADA improvements to pedestrian infrastructure. The City of Goshen is committed to meeting—and where feasible, exceeding—ADA requirements to ensure full accessibility for all individuals with disabilities. Annual updates will be used to evaluate and communicate progress toward these goals. The City's Transition Plan addresses all the efforts completed to date while also addressing needs that still exist and are in the queue for further improvements. In addition, the City is committed to completing an Action Plan to further evaluate and ensure accessibility for all programming and technology within the next year.

TRANSITION PLAN HISTORY AND OVERVIEW

The City of Goshen prepared its first Americans with Disabilities Act (ADA) Transition Plan in 1992, with a primary emphasis on the removal of architectural barriers within public buildings, facilities, and programs. Concurrently, the City initiated a Sidewalk Replacement Program to expand and enhance accessible pedestrian infrastructure.

On October 5, 2005, the Goshen Common Council adopted Resolution 2005-52, which established priority areas for sidewalk improvements. Pursuant to this resolution, the Council directed the Goshen Engineering Department to conduct a comprehensive inventory of sidewalk conditions and to identify deficiencies and gaps in coverage. The initial inventory was completed in 2010, and records have since been updated to ensure that identified priority areas

are addressed in an orderly manner.

The City of Goshen has also instituted and continues to uphold several key policies pertaining to accessibility, including:

- Installation of ADA-compliant curb ramps in conjunction with adjacent street resurfacing projects
- Integration of sidewalk installation or repair into roadway reconstruction efforts
- Requirements for sidewalk construction in new residential and commercial developments

In 2018–2019, the City conducted comprehensive accessibility evaluations of all public facilities. Implementation of recommended improvements has been ongoing, with the objective of remedying identified deficiencies and enhancing overall accessibility. The Parks Department has likewise undertaken systematic evaluations of all play areas and continues to implement improvements on an annual basis.

Geographic Information System (GIS) technology has become an increasingly valuable tool for developing and maintaining comprehensive accessibility records. The City intends to further expand the application of this technology to support long-term planning and implementation of accessibility improvements throughout Goshen.

ADMINISTRATIVE INFORMATION

ADA Coordinator

The City of Goshen has designated Rita Huffman, HR Director, as its ADA Coordinator. This individual is point of contact for ADA-related inquiries, accommodations, and investigations.

Taskforce for Community Accessibility

To support the vision, the City is establishing a Taskforce for Community Accessibility (TCA). Comprised of representatives from various departments and the ADA Coordinator, the TCA intends to collaborate with the Goshen Community Relations Commission to:

- Advance current accessibility initiatives,
- Advocate for the rights and needs of individuals with disabilities, and
- Raise awareness about accessibility challenges and solutions.

The TCA will bring together diverse leadership perspectives and a shared commitment to inclusion. Its members will work toward a vision of a community where all residents are empowered and equitably supported.

PUBLIC OUTREACH AND PARTICIPATION

The City of Goshen formally adopted its ADA Transition Plan on July 9, 2012. Prior to adoptions, opportunities were provided for public comments through the following methods:

- Document copies were made available, and notices sent to local public libraries
- Document copies were made available on the City of Goshen's website
- An Open House and presentation were made at a public meeting on June 4, 2012.

The City of Goshen published legal notices in The Goshen News starting on May 11, 2012. The legal notices announced the availability of the Transition Plan draft at the local public library with easy public access. These

notices also provided instructions regarding the timetable for comments and where to send them. Public comments were accepted for a period of 30 days, ending June 15, 2012. A copy of the comment form was provided in the 2012 Transition Plan. While this document is considered a Transition Plan Update, no additional comments were requested. However, it is anticipated that additional opportunities will be available for comment as the 2026 goals are pursued to expand accessibility.

GRIEVANCE PROCEDURE

Residents may file accessibility complaints through:

Rita Huffman
Title VI / ADA Coordinator
204 E Jefferson St, Suite 3
Goshen, Indiana 46528
humanresources@goshencity.com

A copy of the Grievance Policy, the Grievance Form and the Grievance Log that is maintained by the City are attached as Appendix A.

ADA STANDARDS AND GUIDELINES

The City of Goshen is committed to ensuring that all its new facilities, including buildings, parks, trails and sidewalks, and all renovations to those facilities, comply with the ADA. The City also works to ensure accessibility by installing accessibility improvements that go beyond physical accessibility to buildings and sidewalks.

On July 31, 2025, the City's Board of Public Works passed Resolution 2025-20, adopting the Americans with Disabilities Act 2010 Standards of Accessible Design and the Public Right of Way Accessibility Guidelines (PROWAG) as the standards to follow for evaluation, design and construction of government facilities and infrastructure in the public right of way (see Appendix D for a copy of the resolution). The City will continue to comply with the ADA 2010 Standards for Accessible Design and PROWAG in all future projects and improvements.

MONITORING AND UPDATES

The ADA Transition Plan will be reviewed biennially, with progress reports published on the City website. The public will be engaged through annual community forums and updated surveys.

SELF-EVALUATION OF THE PUBLIC RIGHT-OF-WAY

As outlined in its 2012 ADA Transition Plan, the City of Goshen had utilized a two-tiered system to identify and evaluate barriers within the public right-of-way. This involved a preliminary evaluation of curb ramps and sidewalks using aerial and street-level imagery to determine non-compliance or potential compliance, with more detailed evaluations implemented to make a final determination of those “potentially compliant” pedestrian facilities. Evaluations and replacement priorities were organized by intersection. A majority of the intersections in the prioritized list of areas had received a preliminary evaluation.

To have a full picture of accessibility, City staff completed a detailed evaluation of all pedestrian facilities in the City’s right-of-way. The use of Geographic Information Systems (GIS) technology has been a foundational component to this effort. GIS technology allows the capture, storage, and analysis of spatial data in a map-based format. With advancements in the capabilities of GIS systems and its integration in the City’s planning and operations by GIS staff, it made sense to evaluate the accessibility and condition of each type of facility the same way, collecting similar data for each.

Goshen’s GIS staff developed web-based applications, including a custom scoring system, that enabled documentation and evaluation of the conditions of sidewalks, shared use paths, curb ramps and associated crosswalks throughout the City. In 2024 and 2025, two Engineering and GIS summer staff recorded the condition of all of these pedestrian facilities. Evaluation of compliance to ADA, and identification of non-compliant barriers, was made with metrics based on the Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), developed by the U.S. Access Board.

Sidewalk Evaluation

The City’s sidewalk¹ and shared use path network is broken into segments (typically from one intersection to the next). Field inspectors take representative measurements of sidewalk width, cross-slope, and record the surface type (concrete or asphalt) for each segment in the City’s GIS system. As they walk along the segment, variations in width or cross-slope are noted, and observed defects (i.e. vertical faults, obstructions, cracks, or missing panels) are recorded as point data along with pictures. Defects are categorized and weighted in the scoring system according to whether they affect ADA compliance and are considered barriers to accessibility (see Appendix B for a complete list of all types of sidewalk defects and barriers).

Curb Ramps and Crosswalks

Each curb ramp² or blended transition in the City’s pedestrian and active transit network is evaluated by field

¹ For the purposes of this document, “sidewalks” can be used to indicate both sidewalks (side paths along roadways), for use by pedestrians walking or traveling via a mobility aid (such as a wheelchair), as well as designated shared use paths (or trails) utilized by bicycles, scooters, and other forms of active transit, as well as those walking or traveling via a mobility aid.

² For the purposes of this document, “curb ramps” is used to denote both curb ramps, which are sloped connections cut through a curb, and blended transitions, which are wraparound connections at a corner or flush transitions where there is no curb.

inspectors with measurements recorded in GIS to evaluate conformity to PROWAG standards. Evaluation considers the type of location (such as a street crossing at a typical intersection vs a roundabout), the traffic control at the intersection approach, the type of pedestrian facility, as well as the type of edge transitions on the sides of the ramp.

A set of basic measurements is recorded as a baseline for each ramp, regardless of whether there are obvious non-compliant aspects. These include width, length, cross-slope, and running slope of the ramp, turning spaces, and landings, as well as characteristics of the detectable warning surface. Provided a curb ramp is "potentially compliant" at this stage, further measurements are taken to determine if the entire curb ramp conforms to PROWAG requirements. Evaluations are also made of the crosswalk leading from each curb ramp. Crosswalks are divided into two halves, and data from each half is recorded with the adjoining curb ramp.

Based on the values recorded and utilizing a checklist based on PROWAG, field inspectors evaluate whether each curb ramp, crosswalk, and APS is ADA-compliant. Any questions regarding compliance are referred to Engineering Department staff for final determination. See Appendix B for the compliance checklist for determining all accessibility barriers for curb ramps and crosswalks.

BARRIER REMOVAL METHODS: POLICIES AND PRIORITIES

The City of Goshen employs multiple strategies to remove accessibility barriers in the public right-of-way, including:

- Proactively identifying and addressing barriers,
- Responding to public complaints, and
- Ensuring that all new construction meets the latest design standards.

Specific efforts that illustrate these methods are outlined below:

ADA Improvements within Project Planning Efforts

Curb ramps that are not in compliance are replaced as part of adjacent roadway reconstruction and street resurfacing projects. Opportunities for complete corridor reconstruction, including sidewalk installation or repair, are evaluated during project planning efforts.

Sidewalk Replacement Program

Since 1992, the City of Goshen has offered a Sidewalk Replacement Program. The City contributes funds toward requested replacements depending on the condition score of the segment, up to the full cost for sidewalk that is highest priority and in the worst condition.

GIS Documentation and Evaluation

Goshen's use of GIS systems has enabled mapping and automatic scoring of all pedestrian facilities across the City. GIS applications allow for relating data spatially, so that those curb ramps, crosswalks, or even sidewalk segments requiring replacement can be identified within or nearby proposed project limits. Sidewalk or curb ramp replacement project limits and quantities can also be generated more easily with GIS tools.

Swift Response to Hazards

The City has developed in-house staff resources to address ADA hazards in a timely manner. When a trip hazard, an obstruction, or another critical defect is reported, a work order is immediately generated and assigned so that the

repair can occur quickly. A GIS application will also be employed to track these work orders and repairs.

Improved Inspection and Permitting Processes

Since 2019, the City Building, Engineering, Fire, Planning, Redevelopment, Stormwater, and Street Departments, as well as Code Enforcement, have utilized a land management software to coordinate plan review, project planning, permitting, inspection, and compliance enforcement tasks. The software has helped ensure ADA compliance through tracking plan comments and revisions where site developments, driveways, or other work in the right-of-way involves including scheduling and documentation of permit inspections.

Within the past eight years, improvements have also been made in the right-of-way permit inspection process, ensuring that pedestrian facilities are evaluated both when forms are set and after concrete is cured. Improved inspection equipment is also being utilized, including digital 2-ft electronic levels that quickly and accurately measure sidewalk and curb ramp slopes.

Barrier Removal Priorities

Barrier removal priorities are based on location significance and accessibility condition.

Location Priority

According to the *Special Report: Accessible Public Rights-of-Way – Planning and Designing for Alterations*, the Department of Justice regulation concerning transition plans states that the plan “shall include a schedule for providing curb ramps’ on ‘walkways’ controlled by the public entity, ‘giving priority to the walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.’ 28 C.F.R. 35.151(d)(2).”

Following both the Department of Justice prioritization and estimated sidewalk usage, sidewalks are scored based on walk-time proximity along the sidewalk network to selected Points of Interest (POIs). POIs include locations such as City buildings, bus stops, the Goshen Public Library, grocery stores, schools, Goshen College, the post office, City parks, healthcare facilities, the Elkhart County Fairgrounds and other key locations. Curb ramp location priority is determined in relation to adjacent sidewalk segments.

Raw POI Score	Conversion	Scaled POI Score (1 – 10)
Number of POIs within 5-, 10-, and 15-minute walk-times of a sidewalk segment	<i>Natural breaks of raw POI score distribution</i>	1 = Highest Density of POI Walkability
X		...
Factor Weight		10 = Lowest Density of POI Walkability

Accessibility Condition

Sidewalks are given a Condition Score based on the number and severity of defects. Of all defects, those affecting ADA compliance are given a higher weight, times 2. Of the ADA Non-Compliant defects, those most severe are factored times 3. This total number is then divided over the length of the segment, normalized, and converted to a scale from 1 to 10, with 1 being the worst condition and 10 the best:

Raw Condition Score	Conversion	Condition Score (1 – 10)
Critical Defects X 3 + (ADA Non-Compliant Defects – Critical Defects) X 2 + (Total Defects – ADA Non-Compliant Defects) Segment Length X 100	<i>Natural breaks of raw condition score distribution</i>	1 = Worst Condition ... 10 = Best Condition

Curb ramp compliance is determined for each part of the ramp (as shown below) based on the detailed field evaluations. All parts of the ramp must be compliant for the ramp to be compliant overall. Crosswalks may be evaluated separately in the future; however, changes required for crosswalk compliance (such as correcting cross-slope) may require replacement of the curb or curb ramp.

Curb Ramp Compliance by Part	
Compliant Ramp	Yes / No
Compliant Turning Space	Yes / No
Compliant Landing	Yes / No
Compliant Bottom of Ramp	Yes / No
Compliant DWS	Yes / No
Compliant Crosswalk	Yes / No
Total Raw Compliance Score	Yes / No

Combined Score

The combined score is a simple calculation that weights the Condition Score over the POI score and allows for manual manipulation to elevate sidewalks of particularly high importance (i.e. defined school walking routes).

$$((\text{POI Score} - \text{Segment Override}) * 0.4) + (\text{Condition / Compliance Score} * 0.6)$$

The prioritized Combined Score is based on a 1 – 10 scale, with:

- 1 being the highest priority sidewalks
 - Worst-condition with the greatest number of POIs within walking distance, and
- 10 being the lowest priority sidewalks
 - Best condition and most remote from any POIs

Curb ramps are not prioritized separately from sidewalks, except that locations where a crosswalk exists without connecting curb ramps are given the highest priority. Replacement priority of non-compliant curb ramps is determined in relation to the Combined Score of adjacent sidewalk segments as those pedestrian routes are selected for repair or replacement. Non-compliant curb ramps are also reconstructed when adjacent to roadway reconstruction or resurfacing projects.

ACCESSIBILITY IMPROVEMENTS IN THE PUBLIC RIGHT-OF-WAY

Goshen has made significant efforts in improving accessibility within the right-of-way. Highlighted infrastructure improvements and advances in data collection and evaluation methods are also included. The City is committed to the continued removal of barriers that prevent or limit the use of pedestrian facilities by individuals with disabilities.

Improvements and Progress in the Removal of Barriers

- Between 2015 and 2025, more than 25,000 square feet of sidewalk has been replaced through the City's Sidewalk Replacement Program, alone.
- From 2022-2025, over 30 sidewalk trip hazards and other accessibility barriers have been quickly resolved by Goshen's crews.
- From 2014 through July 2025, more than 130,000 SFT of sidewalk and 20,000 SFT of curb ramps have been replaced or installed as part of the City's projects (not including INDOT-initiated projects).

Improved Data Collection for Evaluation and Planning

- From 2024-2025, City staff have made comprehensive efforts to fully evaluate sidewalks, curb ramps, and crosswalks within the right-of-way.
- Goshen's GIS staff expanded system capabilities, developing tools which allow for the documentation and evaluation of all sidewalks and curb ramps.
- During 2024 and 2025, two pairs of Engineering and GIS summer interns walked all the concrete and asphalt sidewalks and shared use paths in the City, rating and documenting defects on over 185 miles of pedestrian routes. They inspected and evaluated each of the City's 1687 curb ramps in the right-of-way, taking as many as 50 separate measurements to fully investigate each ramp and crosswalk for conformance to PROWAG.
- Utilizing GIS, staff determined walk-time proximity of all sidewalk segments to selected points of interest (POIs).
- Engineering staff is coordinating with Goshen Community Schools and the Parks Department to evaluate and prioritize school walking routes and City trails.

Ongoing Investment in Barrier Removal and Evaluation

- Engineering staff have set a yearly goal of investing \$300,000 into City sidewalk and curb ramps.
- Re-evaluation of all City sidewalks and curb ramps is planned every five years going forward.
- Sidewalks in downtown Goshen are evaluated for trip hazards on an annual basis.

Upcoming Projects

- In 2026, the City plans to invest \$1,000,000 in sidewalk and curb ramp improvements for the Sidewalk Replacement Program as well as several other priority areas in the City.
 - Estimate of almost 30,000 SFT of sidewalk
 - Estimate of over 4,000 SFT of curb ramps
- In 2026, approximately 5,000 linear feet (LFT) (25,000 SFT) of sidewalk and 700 SFT of curb ramps will be reconstructed as part of the North Goshen Neighborhoods Lead Service Line Replacement Project.

SELF-EVALUATION OF PUBLIC FACILITIES

Self-evaluation of public facilities is required to ensure compliance with federal civil rights law by making all programs, services, and activities—when viewed in their entirety—readily accessible to individuals with disabilities. The City of Goshen began the process of reviewing the structural and architectural barriers of city facilities in the 1990's and has made continued efforts to bring all facilities into compliance since that time.

Specifically, the plan addresses architectural and structural barriers in:

- Government buildings.
- Parks and recreation centers; and
- Other public-use infrastructure

Primary Goals

1. Identify existing barriers in public facilities.
2. Outline corrective methods to remove or mitigate those barriers.
3. Set timelines and priorities for implementation.
4. Assign accountability by designating an official responsible for execution.

Inclusive Access

The transition plan reflects a commitment to:

- Equity and inclusion in civic life,
- Independence and dignity for people with disabilities, and
- Public engagement, especially from individuals with lived experience of disability.

Facilities List

A full list is included on the following pages that includes all facilities with their corresponding addresses, evaluation status and information regarding deficiencies requiring correction. City staff will utilize this list to plan for the improvements needed over the next two years. Copies of the full ADA checklist evaluations are maintained at the City's Parks Department Administrative Offices and available upon request.

ADA Transition Plan - City Facility Self-Evaluation Results

Facility Name	Facility Address
Airport	17229 CR 42
No accessibility issues identified.	
Annex Building	204 E Jefferson St
Inadequate number of accessible parking spaces provided. To reconfigure by repainting lines to provide designated accessible space and installing signage. Space location should be selected along the closest accessible route to the building's accessible entrance. Exterior accessible route to accessible entrance is currently 6.2% and should be no more than 5%. Requires reconstruction of sidewalk. Platform lift provides inadequate floor space of at least 36"x 48". To be replaced or the opening to be reconfigured to widen by 2" as current space is 34"x 49". Tactile signage to be installed designating permanent rooms not likely to change. Any signage providing direction should be replaced with signage with required contrasting characters. Door pulls not operable with one hand throughout the building and any inaccessible hardware should be replaced.	
Cemetery Office	N 1st St
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.	
Central Garage	320 Steury Ave
No accessibility issues identified.	
City Hall	202 S 5th St
Curb ramp to be reconstructed as the running slope is too steep. Install signs on route before people get to inaccessible entrances so that people do not have to turn around and retrace route. Install tactile signs for CT's office, Mayor's office, Payroll and IT - See ADA specifications for mounting signs. Install signs with contrasting characters. Ensure 18" x 18" clear floor space centered on the tactile characters so that the baseline of the lowest character is at least 48" above the floor and the highest character is no more than 60" above the floor. Accessible table to be provided in the lobby that is no greater than 34" above the floor. Ensure adequate knee space is provided.	
City Records Facility	1402 Wilden Ave
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.	

Environmental Center	20100 CR 19	
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.		
GFD - Central Fire Station	209 N 3rd St	
No accessibility issues identified.		
GFD - College Ave Fire Station	1203 College Ave	
No accessibility issues identified.		
GFD - Fire Training Facility	2109 Caragana Ct	
Evaluation to be completed in 2026. Facility is a newer facility and no concerns are anticipated but a thorough review will be completed.		
GFD - Reliance Fire Station	1728 Reliance Rd	
No accessibility issues identified.		
GFD - Township Fire Station - North	201 S 22nd St	
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.		
GFD - Township Fire Station - South	308 Egbert Rd	
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.		
Kercher Wellfield	1513 N Eisenhower Dr	
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.		

Police & Courts Building	111 E Jefferson St	Main entrance is not accessible due to a 13.6% slope. An entrance that is accessible should be identified and made available during the same hours as the main entrance. Install signs on route before people get to inaccessible entrances so that people do not have to turn around a retrace route. Install signage at the accessible entrance with the International Symbol of Accessibility. Threshold needs to be lowered to no more than 3/4" with the top 1/2 beveled. Tactile warnings such as partial walls to be installed where paths through the public areas protrude more than 4". Lift signage to be adjusted no be no higher than 60". Lift to be replaced as clear space is currently 1.5" short in width. Install tactile signage designating permanent rooms and spaces not likely to change over time. Ensure that signs have contrasting characters. Light switches to be lowered to be no more than 48" above the floor. Service counter is not accessible. A section to be lowered to no higher than 36" with a 36" depth for knee clearance. Drinking fountain to be lowered to no higher than 36" above the floor for the spout outlet. Public Telephone - Direct line to Fire, Police & Ambulance Only. Bottom of the telephone should be lowered from 37" to no more than 27" and protrudes 5.75" when it should protrude no more than 4" Phone location to be adjusted. TTY to be installed with the appropriate International Symbol of TTY.
Police Shooting Range	715 E Lincoln Ave	
Evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.		
Street Department	475 Steury Ave	
Signage should be installed at the accessible entrance with the International Symbol of Accessibility. Install signage at inaccessible toilet rooms that give directions to accessible toilet rooms. Toilet Room entrance has only 14" clearance from the pull side of the door where 18" is needed. Automatic door opener to be installed. Move or replace toilet to no more than 18" from the side wall where currently 18.75". Flush control needs to be relocated to the open side of the water closet in the toilet room.		
Utility Billing Office	203 S 5th St	
Running slope to the front entrance is too steep. To be reconstructed from 6% to no more than 5%. Carpet to be reviewed to ensure no higher than 1/2". Outside run to be removed or a new rug purchased with appropriate measurements. No access available to conference room, breakroom or toilet rooms. Possible renovation or reconstruction with an accessible route required to avoid existing stairs. Toilet rooms are currently inaccessible. To be reconfigured or combined to create one unisex accessible toilet room. Tactile signage will be required with the International Symbol of Accessibility. Will also require an accessible route.		
Wastewater Plant	1000 W Wilden Ave	
A more thorough evaluation to be completed in 2026. While not a "public" facility, City intends to ensure accessibility is considered for staff.		

Water & Sewer Plant	308 N 5th St	Operable controls should be no higher than 48" above the floor. Currently 49". Toilet Rooms paper dispenser should be located no less than 7" and no greater than 9" from the front of the water closet to the centerline of the dispenser. Current measurement is 22". However, construction occurred prior to 3/15/12 and falls under the 1991 Standards so relocation is not required. A portion of the service counter to be lowered to no more than 36" above the floor and a minimum of 36" long with either a parallel or forward approach feasible.
PARKS FACILITIES		
Parks - Abshire Cabin	1302 E Lincoln Ave	
No accessibility issues identified.		
Parks - Administrative Office	524 E Jackson St	
No accessibility issues identified.		
Parks - Bakersfield Park Playground	1302 Baker Ave	
No sidewalk connection to the playground - route is grass.		
Parks - Burdick Park Playground	125 W Burdick St	
Playground Area #1 has elevated components and no access sidewalk. Perimeter is a raised plastic edging providing to accessibility. Playground Area #2 has ground level play components and sidewalk accessibility to the play area with sidewalks around the entire play area. No access from Area #1 to Area #2.		
Parks - Chiddister Pavilion	1424 Lincolnway East	
No van accessible parking space provided. Parking lot is compacted stone. Regular parking space sign to be raised. Restroom coat hook to be lowered. Toilet paper dispenser to be relocated.		
Parks - Church Park Playground	504 N 8th St	
2 play areas and both are accessible but no accessible route directly from one to the other. Grass and an incline prevent a direct route.		

Parks - Dam Pond Restrooms	725 Fair Oaks Dr
Door closer to be adjusted. Tactile signage to be added at the appropriate height. Grab bars to be moved away from the rear wall 4" and lowered by 1/2".	
Parks - Dykstra Park Playground	1500 E Lincoln Ave
No accessibility issues identified.	
Parks - Fidler Pavilion	1912 W Lincoln Ave
4 accessible spaces need to be added, including 1 van accessible, with required signage. Tactile warning to be constructed around drinking fountain (i.e. permanent planter or partial wall). Tactile signage to be installed at bathrooms. Pipes beneath lavatory to be insulated. Drinking fountain to be adjusted.	
Parks - Hay Park Pavilion	1414 W Plymouth Ave
No van accessible parking space provided but could be reconfigured to provide one with restriping. Parking signage needed at appropriate height. Bathroom door lock to be lowered from 60" to no more than 48". Door closer to be adjusted. Toilet flush control is on the wall side of the water closet and not the open side.	
Parks - Hay Park Playground	1414 W Plymouth Ave
Swings do not have adequate clear space to be accessible.	
Parks - Kauffman Pavilion	212 Prospect Ave
Accessible parking spaces need appropriate signage installed. Bathroom door locks need to be lowered from 60" to no more than 48". Door closer to be adjusted from 3 seconds to at least 5 seconds. Toilet flush control to be relocated to the open side of the water closet.	
Parks - Maintenance Building	
No accessibility issues identified.	

Parks - McFarland Park Playground	125 Vinson Ct
No accessibility issues identified.	
Parks - Mill Street Playground	212 Prospect Ave
There are a few ground play components that are not accessible due to slope and grass route. There is an accessible play area with engineered wood fiber mulch. Separate play area is not accessible as the surface is grass. There are two lookout decks with ramps that are not accessible due to slope.	
Parks - Millrace Powerhouse	
Route to the entrance is not accessible. Existing gravel to be replaced with concrete. Route from accessible parking to entrance to be reggraded. Exterior route is currently sloped at 4.35% for the gravel portion and 3.7% for the cross slope and currently not accessible. Signage to be installed at all inaccessible entrances indicating the location of the nearest accessible entrance and along the route prior to reaching the inaccessible entrances. Sign to be installed at the accessible entrances with the International Symbol of Accessibility. Front approach to the pull side of the door is at least 18" of maneuvering clearance beyond the last side. (Currently 7"). Automatic opener to be installed. Operable parts of door hardware are greater than 48" above the floor. Automatic opener to be installed.	
Parks - Model School Park	310 S Greene Rd
No accessibility issued identified.	
Parks - Oakridge Park Playground	715 N 1st St
Raised plastic playground perimeter curb prevents accessibility. No sidewalk access to playground.	

Parks - Oakridge Pavilion	715 N 1st St	Sidewalk to be installed from the parking lot to the pavilion to create an accessible route. Parking lot constructed of limestone so no parking striping in place. Parking signage to be installed. Aisles adjacent to handicap spaces unable to be added until parking lot is paved. Will need to be regraded, as well, as surface is currently 2:48 slope. Toilet room tactile signage to be installed. Toilet room lock to be lowered to no more than 48". Door closer to be adjusted from 3 seconds to at least 5 seconds. Toilet room grab bars to be lowered. Toilet flush valve to be moved to open side of the water closet. Drinking fountain to be lowered from 37" to no more than 36".
Parks - Pringle Park Playground	1912 W Lincoln Ave	
No accessibility issued identified.		
Parks - Pringle Park Splash Pad	1912 W Lincoln Ave	
Evaluation to be completed in 2026. Facility is a newer facility, and no concerns are anticipated but a thorough review will be completed.		
Parks - Reith Park Playground	1508 S 13th St	
No accessibility issued identified.		
Parks - Rieth Interpretive Center	410 W Plymouth Ave	
Tactile signage needs to be installed for permanent rooms and spaces. Tactile signage needs to be installed for Toilet Rooms. Door closer needs to be adjusted from 4 seconds to 5 seconds. Constructed prior to 2012 to Toilet Room grab bars are grandfathered. However, they could be adjusted to become compliant. Toilet Room doors are not self-closing.		
Parks - Rieth Park Splash Pad	1508 S 13th St	
Evaluation to be completed in 2026. Facility is a newer facility, and no concerns are anticipated but a thorough review will be completed.		

Parks - Rieth Pavilion	1508 S 13th St	Parking area is compacted limestone so no delineated accessible parking spaces. Signage for a van accessible space to be installed. Tactile signage to be installed at Toilet Rooms. Door lock to be lowered to no more than 48". Door closer to be adjusted from 3 seconds to no less than 5 seconds.
Parks - Riverdale Park	785 W Wilkinson	Evaluation to be completed in 2026. Facility is a newer facility, and no concerns are anticipated but a thorough review will be completed.
Parks - Rogers Park Playground	102 Chicago Ave	No sidewalk leading to the play area as there is a large curb around the perimeter preventing accessible access. Playground's pea gravel cover makes the play area inaccessible. Pea gravel utilized due to park's frequent flooding.
Parks - Schrock Pavilion	411 W Plymouth Ave	Tactile signage needs to be installed for Toilet Rooms. A lower mirror to be added at no more than 40". A lower coat hook to be added at no more than 48". Constructed prior to 2012 and grab bars are grandfathered. However, could be adjusted to meet 2010 requirements.
Parks - Shanklin Park Kiwanis	411 W Plymouth Ave	Tactile signage needs to be installed for Toilet Rooms. A lower coat hook to be added at no more than 48". Insulation to be installed below the lavatory around the pipes. Constructed prior to 2012 and lack of door pulls is grandfathered. However, could be adjusted to meet 2010 requirements.
Parks - Shanklin Riverside Pavilion	411 W Plymouth Ave	No aisle markings. Accessible route is currently gravel and to be replaced with asphalt or another surface.

Parks - Shanklin Warming Building	411 W Plymouth Ave	Accessible parking signs to be installed to meet requirements. Parking area to be restriped to create van-accessible space with required markings. No accessible entrance into the building except for the restrooms. Tactile signage to be installed for the Toilet Rooms. Insulation to be installed below the lavatory around the pipes.
Parks - Sprocket Dog Park		
Evaluation to be completed in 2026. Facility is a newer facility, and no concerns are anticipated but a thorough review will be completed.		
Parks - Tommy's Castle	411 W Plymouth Ave	
No accessibility issued identified.		
Parks - Walnut Park Splash Pad	224 E Oakridge Ave	
Evaluation to be completed in 2026. Facility is a newer facility, and no concerns are anticipated but a thorough review will be completed.		
Parks - Walnut Pavilion	224 E Oakridge Ave	No accessible route from sidewalk to pavilion and existing sidewalk does not meet slope requirements. Parking signage to be installed per requirements. Parking lot constructed of compacted limestone. Parking lot markings to be added at the time that parking lot is paved. Tactile signage to be installed at Toilet Rooms. Door lock to be lowered to no more than 48". Door closer to be adjusted from 3 seconds to at least 5 seconds. Flush control to be moved to open side of water closet.
Parks - Wayne Wogoman Welcome Center	1424 Lincolnway East	Van-accessible parking sign to be added at the proper height. Tactile signage to be added at the restroom. Mirror in the toilet room to be lowered to no more than 40" above the floor.

CITY PARKING LOTS

City Parking - Lot A	East of S 3rd St between Lincoln and Washington
To be fully evaluated in 2026.	
City Parking - Lot B	East of S 3rd St between Washington and Jefferson
To be fully evaluated in 2026.	
City Parking - Lot C	West of N 3rd St between Clinton and Pike (off N/S alley)
To be fully evaluated in 2026.	
City Parking - Lot D	East of S 5th Street between Washington & Jefferson
To be fully evaluated in 2026.	
City Parking - Lot E	East of N 5th Street between Lincoln and Clinton
To be fully evaluated in 2026.	
City Parking - Lot F	West of N 5th Street between Lincoln and Clinton (North of E/W alley)
To be fully evaluated in 2026.	
City Parking - Lot G	West of S 5th Street between Lincoln and Washington
To be fully evaluated in 2026.	
City Parking - Lot H	Southwest corner of Washington and 3rd Street
To be fully evaluated in 2026.	
City Parking - Lot J	Southwest corner of Lincoln and 5th Street
To be fully evaluated in 2026.	
City Parking - Lot K	Southwest corner of Jefferson and 3rd Street
To be fully evaluated in 2026.	

City Parking - Lot L	West of 2nd Street and South of Lincoln Avenue
To be fully evaluated in 2026.	
City Parking - Lot M	North of Washington St between 2nd and 3rd Street
To be fully evaluated in 2026.	
City Parking - Lot N	West of 5th Street between Washington and Jefferson
To be fully evaluated in 2026.	
City Parking - Lot O	East of 3rd Street and west of the N/S alley between 3rd and Main
To be fully evaluated in 2026.	
City Parking - Lot P	South of Jefferson St between 3rd and Main
To be fully evaluated in 2026.	
City Parking - Lot Q	East of Main between Clinton and Pike
To be fully evaluated in 2026.	
City Parking - Lot I	West of N 5th Street between Clinton and Pike Street
To be fully evaluated in 2026.	

SELF-EVALUATION OF PROGRAMS AND SERVICES

The City's programs and services are being evaluated, and a full assessment and Action Plan will be provided in the 2026 ADA Transition Plan update. The intent of the programmatic accessibility review will be to evaluate how individuals with disabilities:

- Access services, activities, and programs
- Receive communication (e.g., availability of ASL interpreters, alternate formats)
- Request reasonable modifications to policies or procedures This will include a full review of:
 - Policies or eligibility criteria that may inadvertently discriminate
 - Emergency procedures
 - Public meetings and events
 - Public participation and grievance procedures

Lastly, a primary goal for the next year is to complete a digital accessibility check that will evaluate the following:

- Assessment to ensure websites, PDFs, and other digital content meet **WCAG 2.1 AA** standards
- Identification of tools, platforms, or content types that need remediation

Documentation Requirements (to be provided in the 2026 Transition Plan Update)

- A written summary of the barriers identified
- A list of corrective actions
- Timelines for implementation
- Evidence of stakeholder engagement, especially with people with disabilities
- Record of public notice and community input opportunities

STAFF TRAINING

Purpose

This training protocol outlines the systematic approach for educating municipal employees on ADA compliance, accessibility best practices, and their roles in the development, implementation, and monitoring of the City's ADA Transition Plan.

Training Goals

- Ensure all relevant staff understand ADA legal obligations.
- Develop internal expertise in identifying and mitigating barriers.
- Standardize ADA training across departments to support consistent implementation of the transition plan.
- Promote ongoing compliance and cultural competency in public service delivery.

Audience

Training is mandatory for:

- Department heads and supervisors
- Staff in Public Works, Engineering, Planning, Parks & Recreation, and Code Enforcement
- Customer service representatives and front desk personnel
- Project managers and contract administrators
- ADA Coordinator and compliance teams

Optional for:

- Volunteers and community partners involved in public-facing roles

Training Components

ADA Basics and Legal Foundations

- Overview of the ADA and its application to local governments (Title II)
- Key definitions: qualified individual with a disability, reasonable modification, program accessibility

ADA Transition Plan Fundamentals

- Purpose and scope of the ADA Transition Plan
- Overview of self-evaluation and barrier identification process
- Prioritization criteria for remediation (safety, location, public use)
- Barrier Recognition and Documentation
- Field training on how to assess facilities, sidewalks, and right-of-way
- Use of ADA checklists and mapping tools
- Procedures for submitting barrier reports
- Accessible Communication and Public Engagement

- Providing effective communication for individuals with hearing, vision, or cognitive disabilities
- Making public meetings and information fully accessible
- Best practices for collecting community feedback

Departmental Integration and Reporting

- How each department contributes to the transition plan's success
- ADA responsibilities in procurement, construction, permitting, and event planning
- Reporting requirements and data collection standards

Training Schedule and Format

Training Type	Frequency	Delivery Method	Duration
Initial Orientation	Onboarding	Online or In-person	1 hour
Annual Refresher	Yearly	Online or Departmental Workshop	2 hours
Specialized Role-Based	As needed	Targeted (e.g. planners, engineers)	Varies

All training must be completed within 90 days of hire or role change for applicable employees.

Responsibilities

- ADA Coordinator: Oversees training content, delivery, and compliance tracking.
- Human Resources: Tracks participation and includes ADA content in onboarding.
- Department Heads: Ensure staff attendance and application of training in workflows.
- Legal: Supports integration of ADA principles into policy and operations.

Documentation and Evaluation

- Maintain attendance and completion records for each training session.
- Evaluate training effectiveness through staff feedback, quizzes, or observation.
- Update materials annually to reflect changes in ADA regulations or transition plan updates.

Continuous Improvement

- Regularly review training outcomes and make adjustments based on:
 - o Regulatory changes
 - o Community accessibility concerns
 - o Internal audits or legal review
- Encourage feedback from staff and the public to enhance training relevance and impact.

LOOKING FORWARD - 2026 ADA GOALS

The City's goals for 2026 aim to advance accessibility across all City programs, facilities, and public spaces through updated evaluation methods, deeper engagement, expanded staff education, and continued investment to remove barriers. These goals support compliance with Title II of the Americans with Disabilities Act while fostering a culture of equity and inclusion.

Enhanced Self-Evaluation of Municipal Programs and Services

GOAL

Conduct a comprehensive review of all City programs, services, and activities to ensure they are accessible to individuals with disabilities—beyond physical infrastructure.

KEY ACTIONS

- Audit program policies, procedures, and eligibility requirements for potential barriers.
- Review digital accessibility of service delivery, forms, and web platforms.
- Interview or survey staff and community stakeholders with disabilities to identify service gaps.
- Develop an internal checklist and reporting tool to document findings consistently.

OUTCOME

An updated self-evaluation report that includes programmatic accessibility priorities and a corrective action plan embedded within the broader transition plan.

Complete Trailway and Greenway Accessibility Assessment

GOAL

Evaluate the City's network of trails, greenways, and shared-use paths for compliance with ADA standards and usability for residents with mobility, vision, or cognitive disabilities.

KEY ACTIONS

- Apply PROWAG (Public Rights-of-Way Accessibility Guidelines) and US Access Board guidance.
- Use GIS-based tools to log conditions, grades, surfaces, and access points.
- Incorporate community feedback, including users with lived experience.
- Prioritize trails near neighborhoods, schools, and transit connections.

OUTCOME

A published inventory of trail barriers with an integrated remediation timeline, included as a standalone section within the transition plan.

Continued Improvements to Public Pedestrian Facilities

GOAL

Completion of planned curb ramp and sidewalk replacements in 2026, ensuring full ADA-compliance.

KEY ACTIONS

- Confirm best-practice ADA curb ramp designs at locations with challenging geometry and limited right-of-way, consulting US Access Board technical guidance.
- Review project details and specific ADA requirements during project pre-construction meetings.
- Highlight upcoming concrete flatwork during project progress meetings to ensure that pedestrian access routes are understood.
- Prioritize inspection of sidewalks and curb ramps during screeding and finishing operations.

OUTCOME

Full removal of accessibility barriers over approximately 50,000 SFT of sidewalk and 4,500 SFT of curb ramps.

Develop and Distribute Staff-Focused Accessibility Resources

GOAL

Equip City staff with practical tools and ongoing guidance to maintain accessibility in daily operations and public interactions.

KEY ACTIONS

- Develop a branded ADA toolkit that includes:
 - Accessibility tip sheets
 - Quick reference cards for communication accommodations
 - Facility inspection checklists
 - FAQs on event and meeting accessibility
- Distribute materials both digitally and in print.
- Integrate materials into onboarding, annual training, and supervisory manuals.

OUTCOME

An internal library of ADA resources accessible to all departments, supporting a proactive approach to access in service design, maintenance, and public engagement.

Implementation Timeline

Quarter	Focus
Q1 2026	Kick-off, finalize scope, update evaluation tools
Q2 2026	Begin programmatic and trailway evaluations
Q3 2026	Complete facility assessments, draft updated Transition Plan
Q4 2026	Distribute staff resources, finalize public plan update, adopt by resolution

APPENDICES

- Appendix A Non-Discrimination Policy, Notice, Grievance Policy, Grievance Form and Grievance Log
- Appendix B Sidewalk and Curb Ramp Evaluation Guidelines
- Appendix C ADA Priority Maps and Priority Summaries
- Appendix D Resolutions

APPENDIX A

1. Adopted Non-Discrimination Policy
2. Public Notice Documents
3. Grievance Procedure
4. Grievance Form
5. Grievance Log

NON-DISCRIMINATION

Adopted By: Board of Public Works and Safety

Date Adopted: April 22, 1996 (Non-Discrimination in Employment); January 27, 1992 (ADA Coordinator)

Revised: April 17, 2017; January 24, 2022; February 14, 2022

Employees Affected: All Departments, Offices, and Employees

Section 1. Background

- A. Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d) provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance.
- B. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794) provides that no otherwise qualified individual with a disability in the United States shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.
- C. Section 162(a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. §324) provides that no person shall on the ground of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance under this title [Title 23, United States Code] or carried on under this title [Title 23, United States Code].
- D. The Age Discrimination Act of 1975 (42 U.S.C. §6102) provides that no person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance.
- E. The Civil Rights Restoration Act of 1987 (PL 100-259) amended Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975 to clarify that a recipient of Federal financial assistance must comply with the civil rights laws in all operations of the recipient and not just the program or activity receiving the Federal funding.
- F. Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. §12132) provides that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.
- G. Presidential Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires Federal agencies to

administer and implement its programs, policies, and activities that affect human health or the environment so as to identify and avoid "disproportionately high and adverse" effects on minority and low-income populations.

- H. Presidential Executive Order 13166, Improving Access to Services for Persons With Limited English Proficiency, requires recipients of Federal financial assistance to provide meaningful access to programs and activities for persons who, as a result of national origin, are limited in their English proficiency.

Section 2.

Discrimination Prohibited.

- A. The City of Goshen is an equal opportunity employer and shall comply with and uphold all federal laws and administrative guidelines prohibiting discrimination on the basis of race, color, religion, sex, gender identity, age, gender, disability, ancestry, genetic information, or national origin. It is the policy of the City of Goshen that no employee or applicant for employment shall be discriminated against, excluded from participating in, denied the benefits of, or otherwise subjected to discrimination in any program, activity or other privilege of employment based on the above causes of prejudice.
- B. It shall be the policy of the City of Goshen, Indiana that no person shall, on the grounds of race, color, national origin, sex, age, income status, or limited English proficiency be excluded from participation in, be denied the benefits of, or be subject to discrimination under any of the City of Goshen's services, programs, or activities.
- C. It shall be the policy of the City of Goshen, Indiana that will not discriminate against a qualified individual with a disability in job application procedures; the hiring, advancement or discharge of employees; employee compensation; job training; and other terms, conditions, and privileges of employment. Further, no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of the City of Goshen, or be subjected to discrimination by the City.

Section 3.

Notices.

- A. Notice of Nondiscrimination. The City of Goshen Notice of Nondiscrimination attached to this policy is the City of Goshen's notice to inform applicants, participants, beneficiaries, and other interested persons of the protections against discrimination assured by this policy in the services, programs, and activities of the City.
- B. Notice under the Americans with Disabilities Act. The City of Goshen Notice under the Americans with Disabilities Act attached to this policy is the City of Goshen's notice to inform applicants, participants, beneficiaries, and other interested persons of the protections against discrimination assured by the Title II of the Americans with Disabilities Act and this policy in the services, programs, or activities of the City.
- C. The Notice of Nondiscrimination and Notice under the Americans with Disabilities Act shall be provided to the public by posting at all City of Goshen facilities open to the public, distributing to all City of Goshen departments and offices, publishing on the City

of Goshen's website, and presenting in other accessible formats as may be determined from time to time.

Section 4. **Title VI Coordinator and ADA Coordinator.**

The City of Goshen Human Resources Manager is designated as the Title VI Coordinator and ADA Coordinator. The Title VI Coordinator and ADA Coordinator is responsible for coordinating the efforts of the City of Goshen to comply with the Nondiscrimination Statutes/Rules/Regulations/Policies and to assist in processing any complaint communicated to the City alleging discrimination. The Title VI Coordinator and ADA Coordinator may be contacted at:

City of Goshen Human Resources Department
Attention: Title VI Coordinator and ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Phone: (574) 534-8475
TDD: (574) 534-3185
Fax: (574) 534-2410
Email: humanresources@goshencity.com

Section 5. **Grievance Procedure.**

- A. The City of Goshen Grievance Procedure under the Americans with Disabilities Act and Nondiscrimination Policy attached to this policy is the City of Goshen's process for a person to file a complaint of alleged discrimination.
- B. This grievance procedure shall be provided to the public by posting at all City of Goshen facilities open to the public, distributing to all City of Goshen departments and offices, publishing on the City of Goshen's website, and presenting in other accessible formats as may be determined from time to time.
- C. The Title VI Coordinator and ADA Coordinator shall maintain documentation of all complaints received alleging discrimination, resolutions provided, hearings requested, and other pertinent information for at least three (3) years.

Section 6. **Title VI Program/Nondiscrimination Implementation Plan**

The Goshen Board of Public Works and Safety shall adopt and annually update a Title VI Program/ Nondiscrimination Implementation Plan to ensure continuous compliance with Nondiscrimination Statutes/Rules/Regulations and the City's Nondiscrimination Policy. The Title VI Program/Nondiscrimination Implementation Plan shall include, but is not limited to:

- A. This policy, including the current notices, Title VI Coordinator and ADA Coordinator information, and grievance procedures.
- B. Monitoring of program participants and beneficiary demographics and activities promoting compliance with the Title VI Program.
- C. Process and procedures for handling complaints alleging discrimination.
- D. Title VI training of staff.

- E. Title VI Assurances document.
- F. Annual work plan of Title VI activities and actions.
- G. Annual accomplishment report highlighting efforts to ensure nondiscrimination practices in all City of Goshen activities.

Section 7. Miscellaneous

- A. The notices and grievance procedure under this policy shall be updated as needed with the name of the current individual employed as the Human Resources Manager and designated as the Title VI Coordinator and ADA Coordinator without amending this resolution.
- B. Resolution 2011-Q, A Resolution of the City of Goshen Board of Public Works and Safety Adopting the Americans with Disabilities Act (ADA) Accessibility Guidelines for Standards for Accessible Design and Guidelines for Pedestrian Facilities in the Public Right-of-Way, adopted December 12, 2011 continues in full force and effect.
- C. Resolution 2012-J, Adopting the Americans with Disabilities Act Transition Plan for Pedestrian Facilities in the Public Right-of-Way, adopted July 9, 2012, continues in full force and effect.



CITY OF GOSHEN NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT ("ADA")

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Goshen, Indiana will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: The City of Goshen does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the US Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: The City of Goshen will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the its programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The City of Goshen will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in the City's offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Goshen should contact the ADA Coordinator, using the contact information below, as soon as possible but no later than forty-eight (48) business hours before the scheduled event. The City of Goshen will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs. The ADA does not require the City of Goshen to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of the City of Goshen is not accessible to persons with disabilities should be directed to the ADA Coordinator by contacting:

City of Goshen Human Resources Department
Attention: Rita Huffman, ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Phone: (574) 534-8475
TDD: (574) 534-3185
Fax: (574) 534-2410
Email: humanresources@goshencity.com



CITY OF GOSHEN
NOTICE OF NONDISCRIMINATION

In accordance with the requirements of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 162(a) of the Federal-Aid Highway Act of 1973, the Age Discrimination Act of 1975, the Civil Rights Restoration Act of 1987, other federal nondiscrimination statutes and executive orders, and the City of Goshen Nondiscrimination Policy, the City of Goshen, Indiana will not exclude a person from participating in, deny a person the benefits of, or discriminate against any person on the basis of race, color, national origin, sex, age, disability/handicap, income status, or limited English proficiency in the City's services, programs, or activities.

Grievance Procedure: Complaints that a person has been excluded from participation in, denied the benefits of, or subjected to discrimination on the grounds of race, color, national origin, sex, age, disability/handicap, income status, or limited English proficiency under any of the City of Goshen's services, programs, or activities should be directed to the Title VI Coordinator by contacting:

City of Goshen Human Resources Department
Attention: Rita Huffman, Title VI Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Phone: (574) 534-8475
TDD: (574) 534-3185
Fax: (574) 534-2410
Email: humanresources@goshencity.com



**CITY OF GOSHEN GRIEVANCE PROCEDURE UNDER
THE AMERICANS WITH DISABILITIES ACT
AND
NONDISCRIMINATION POLICY**

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA") and the City of Goshen's Nondiscrimination Policy. It may be used by anyone who wishes to file a complaint alleging:

- (1) Discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Goshen; or
- (2) Exclusion from participation in, denial of the benefits of, or discrimination under any of the City of Goshen's services, programs, or activities on the basis of race, color, national origin, sex, age, disability/handicap, income status, or limited English proficiency.

The City of Goshen's Discrimination and Harassment Policy, as may be amended from time to time, governs job-related complaints of discrimination in employment with the City of Goshen.

The complaint should be in writing and contain information about the alleged discrimination, including:

- (1) Name, address and phone number of the person alleging the discrimination.
- (2) Name, address and phone number of person filing the complaint if different from the person alleging the discrimination.
- (3) Description of the alleged discrimination, including date and location, and the remedy sought.

Anyone wishing to file a complaint may use the Grievance Form included with this Grievance Procedure. The Grievance Form is also available on the City of Goshen's website at www.goshenindiana.org. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for a person with a disability upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than sixty (60) calendar days after the alleged violation to:

City of Goshen Human Resources Department
Attention: Rita Huffman, Title VI Coordinator and ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Fax: (574) 534-2410
Email: humanresources@goshencity.com

The Title VI Coordinator and ADA Coordinator will acknowledge the receipt of the complaint within ten (10) working days.

The Title VI Coordinator and ADA Coordinator will forward the complaint to the City of Goshen's Legal Department which will conduct the investigation necessary to determine the validity of the alleged discrimination. The Legal Department may contact the grievant to discuss the matter as part of the investigation. The Legal Department will submit written findings and a proposed resolution within forty-five (45) calendar days of receiving the complaint from the Title VI Coordinator and ADA Coordinator. If a resolution of the complaint is reached during this investigation, the resolution will be documented in Title VI Coordinator and ADA Coordinator's file.

If the grievant is not satisfied with the Legal Department's determination, the grievant may request a hearing before the Goshen Board of Public Works and Safety. The hearing will be scheduled within thirty (30) days of the request unless the grievant and City agree on a different date. The request for a hearing before the Board of Public Works and Safety must be requested with fifteen (15) days of receiving the Legal Department's written findings and proposed resolution. At the hearing the grievant may appear with or without legal counsel. The grievant will be given the opportunity to present evidence, and/or witnesses and will be given the opportunity to question any witnesses that the City presents to the Board of Public Works and Safety.

The resolution of any specific complaint will require consideration of the specific nature of the alleged discrimination, the nature of the access to services, programs, activities, or facilities at issue, the essential eligibility requirements for participation, the health and safety of others, and the degree to which an accommodation would constitute a fundamental alteration to the program, service, activity, or facility or cause undue hardship to City. Accordingly, the resolution of any complaint does not create a precedent for any future complaint.

At any time during the process, a grievant may file a complaint directly with the US Department of Justice, Indiana Civil Rights Commission, or other appropriate state or federal agency. All written complaints received by the Title VI Coordinator and ADA Coordinator or his/her designee, appeals to the Goshen Board of Public Works and Safety or the Board's designee, and responses from these two offices will be retained by the City of Goshen for at least three (3) years.



CITY OF GOSHEN GRIEVANCE FORM

Date: _____

Name of Person Alleging Discrimination: _____

Address: _____

City _____ State: _____ Zip Code: _____

Phone Number: _____

Email: _____

Name of Person Filing Complaint (if different than above) _____

Address: _____

City _____ State: _____ Zip Code: _____

Phone Number: _____

Email: _____

Description of the alleged discrimination, including date and location: _____

Remedy sought: _____

Return to: City of Goshen Human Resources Department
Attention: Rita Huffman, Title VI Coordinator and ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Fax: (574) 534-2410
Email: humanresources@goshencity.com

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APPENDIX B

1. Guideline Used for Sidewalk Defect Documentation
2. Guideline Used for Curb Ramp and Crosswalk Evaluation

Guideline for Sidewalk Defect Documentation

Defect	Description	Example
Cracked Panel	Cracked panel defects are considered a condition-based issue and are not part of ADA compliance assessment. Cracks resulting in trip hazards should always be inputted as a vertical fault which is the more severe defect and does impact ADA compliance. Cracked panels can have two severities: 1. Several 2. Alligator	"Several" "Alligator"
Spalling	Spalling defects are considered a condition-based issue and are not part of ADA compliance assessment. If the impacts of spalling result in a more critical defect, the more critical should be inputted. Spalling can have two severities: 1. First Signs 2. Severe	
Vertical Fault	Vertical faults includes a jutting of pavement that causes an uneven surface. Since they can cause tripping, they carry some of the most liability and are considered a very high priority ADA non-compliant defect. They can fall into one of the following categories which impacts the type of corrective action activity needed. 1. 1/4 - 1/2 in 2. 1/2 in - 2 in	

	3. greater than 2 in 4. Utility Box (curb stop, valve, manhole, etc.) 5. "Pothole" (missing concrete causing a trip hazard rather than heaving or joint issues) Secondarily, the cause of the fault gives insight into whether the issues is expected to be recurring or may benefit from a one-time fix. 1. Tree root 2. Other 3. Unknown	
Missing Panel	Missing panels indicates a spot where sidewalk is missing within a stretch of existing sidewalk. Long stretches with no sidewalk are not categorized as missing panels.	
Bad Cross Slope	To be ADA compliant, cross slopes should not exceed 2% as measured across the panel's width. Many occurrences of bad cross slopes occur at drive and alleyway crossings. Those are inputted under crossing defects.	
Obstructions	Obstructions are noted only when the pathway around the obstruction is less than 4 feet.	

	Infrastructure with plenty of navigable sidewalk space are not considered an obstruction. Obstructions can be categorized as one of the following 1. Pole 2. Tree 3. Hydrant 4. Bollard 5. Vegetation 6. Protrusion (less than __ feet of vertical navigable space).	
Crossing Defect	Crossing defects are noted when a defect occurs at a drive or alleyway crossing. Differentiating in this way allows for analysis that can include or exclude areas where more than just panel replacement may be needed in order to resolve the issue. Crossing defects include the following: 1. Asphalt in poor condition (potholes, alligator cracking, etc.) 2. Concrete in poor condition 3. Non-compliant cross slope (> 2%) 4. Non-compliant running slope (>8.3%) Running slope is measured lengthwise along the segment and is most likely to occur where there are dips down to a drive or alleyway. Some alleys would have a curb ramp and would thus be assessed differently.	

Guideline for Curb Ramp and Crosswalk Evaluation

Curb Ramp Data Term	Typical Compliance Measurement/Range	Units	Min / Max	Non-Typical Compliance Measurement/Range	Compliance / Measurement Notes
Curb Ramp ID					
Install Date					
GENERAL					
Intersection Type					
Intersection Control					
Curb Ramp Type	All may be compliant, except: Crossing - No Ramp; No Ramp Needed, Insufficient Buffer				
Pedestrian Access Route Type					
Edge Treatment					
Detectable Surface Type					
BASE MEASUREMENTS					
Curb Ramp Width	4 ft	Min		Width of Multiuse Path	

Curb Ramp Length	Running slope controls	ft		If curb ramp type is Perpendicular and must extend beyond 15 ft to achieve 8.3% running slope, ramp must be at least 15 ft If curb ramp type is Blended Transition and serves only one pedestrian access route: 5% max If curb ramp type is Blended Transition and serves more than one pedestrian circulation path (prepared surface for pedestrian use, such as sidewalk): 5% max running slope if there is a minimum 4 ft wide Bypass; otherwise, 2.1% max. If curb ramp type is Perpendicular and must extend beyond 15 ft to achieve 8.3% running slope, ramp must be at least 15 ft and running slope may be greater than 8.3% For Perpendicular ramps (leading into crosswalk) or Blended Transitions, no greater than cross slope of crosswalk	
Running Slope	8.3	%	Max		
Cross Slope	2.1	%	Max		

Turning Space Width	4 ft	Min	Width of Multiuse Path	
Turning Space Length	4 ft	Min		
Turning Space Running Slope	2.1 %	Max	If turning space serves two ramps, no greater than cross slope of crosswalk that is perpendicular to turning space running slope.	
Turning Space Cross Slope	2.1 %	Max	No greater than cross slope of ramp that turning space serves. If turning space serves two curb ramps, no greater than cross slope of crosswalk that is perpendicular to turning space cross slope.	
DWS Length	2 ft	Min		
DWS Width	Full width of ramp		Where required for proper installation, a 2-inch border is allowed around outside of DWS	Width excludes flared sides
DWS Visual Contrast	Yes, Contrasted			
Landing Width	4 ft	Min		Width measured perpendicular to direction of travel on ramp above it
Landing Length	4 ft	Min		Length measured in direction of travel on ramp above it

Landing Running Slope	2.1	%	Max	For landing on Parallel ramp, running slope no greater than slope of crosswalk or roadway. For setback on Perpendicular ramp, running slope no greater than 5.0%.	Running slope measured in direction of travel on ramp above it
Landing Cross Slope	2.1	%	Max	For setback on Perpendicular ramp, cross slope no greater than cross slope of crosswalk.	Cross slope measured perpendicular to direction of travel on ramp above it
Crosswalk Width	6	ft	Min	Width of Multiuse Path	Width measured between transverse lines or to outside of longitudinal ("ladder") lines (if there are no transverse lines)
Curb Ramp within Crosswalk	Yes			At a Blended Transition: If Path Type is Multiuse Path, then full width of blended transition needs to be contained within width of crosswalk(s) it serves; if Path Type is not Multiuse Path, a minimum of 48" of blended transitions needs to be contained within crosswalk(s).	
Grade Break within Ramp (slope change)	No				More gradual grade changes within a ramp are being ignored
Grade Break Perpendicular to Ramp	Yes				

OTHER						
Grate Opening Max Width		0.5	in	Max		This refers to the length of the opening. A 0.5" slot may be of any length, as long as the length of the opening is perpendicular to direction of travel
Grate Opening Perpendicular?		Yes				
Ramp Run Slope + Counter Slope (autocalculate)		13.3	%	Max		If over 13.3%, transitional space needed at bottom of running slope of ramp. Minimum 2 feet in direction of pedestrian travel, with 2.1% max running slope and cross slope no greater than cross slope of crosswalk.
RAMPS AND FLARES						
Ramp Running Slope, Cross Slope	(See above under Base Measurements)					
Flare Slope		10	%	Max		Measured along back of curb. Only applies where there is a pedestrian circulation path that is adjacent to curb ramp flares (such as a sidewalk).

DETECTABLE WARNING SURFACE (DWS)					
DWS Placement	All except Non-compliant placement				Parallel Ramp: DWS in Landing, front of tile along back of curb or 6 inches from edge of pavement if no curb Blended Transition: Front corners of DWS at back of curb (with 2 inch concrete border allowed) or 6 inches from edge of pavement if no curb Perpendicular Ramp: DWS at bottom grade break of ramp if max distance from back of curb to grade break is 60 inches or less; otherwise, place as Blended Transition
DWS max Distance from Curb	0 / 2 / 6 / 60	in	Max		(see DWS Placement)

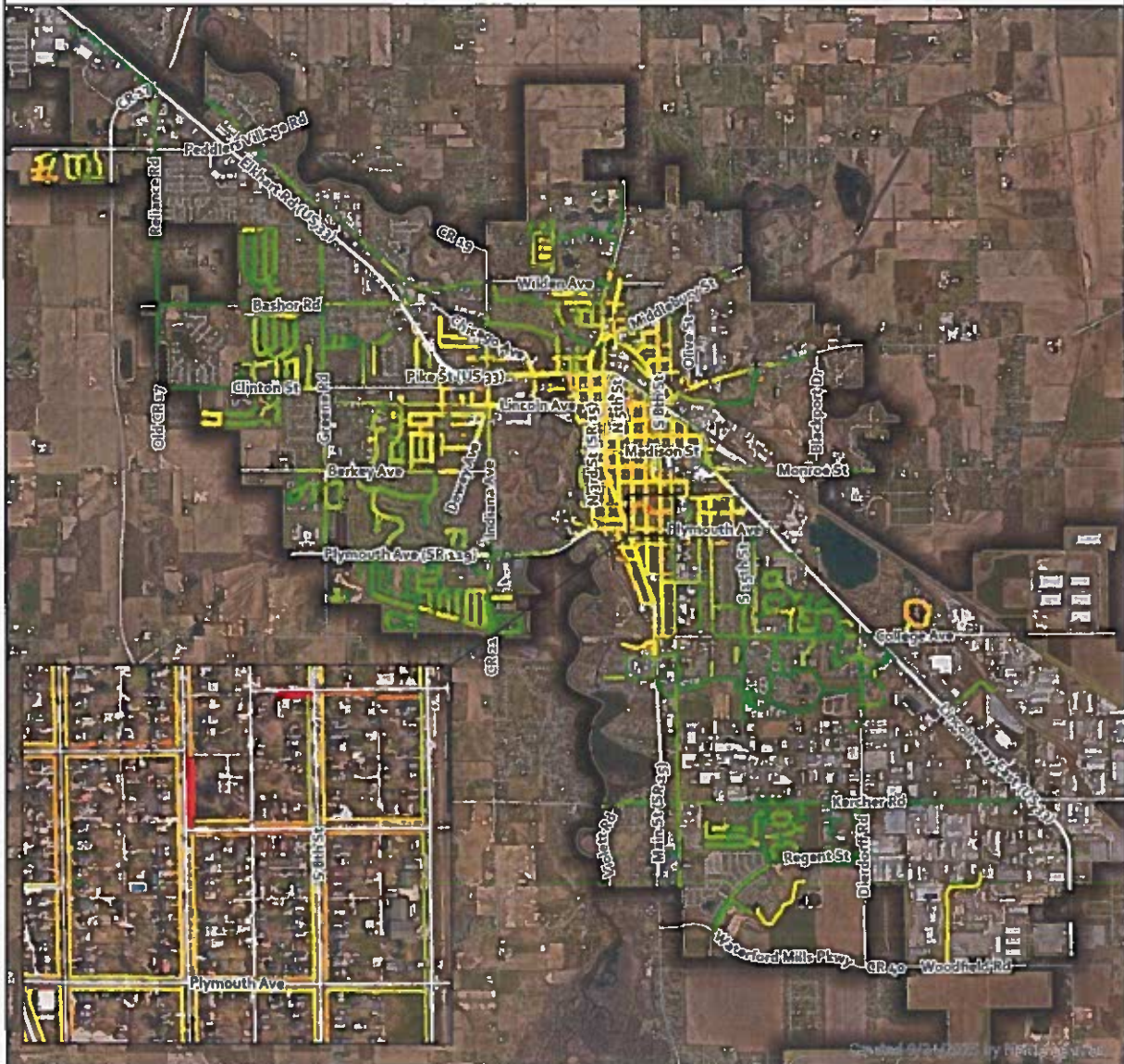
DWS Condition	All may be compliant except Missing, Detached or Loose				
DWS Voids					If Yes and DWS is not stable to walk on, then it is non-compliant
DWS Compliant Domes?	Yes				Twice the normal spacing between domes allowed at cut edges. Partial domes are permitted along cut edges.
APPROACHES					
	Do not Factor Approaches into Curb Ramp Compliance				
TURNING SPACE					
By-Pass Width		4 ft		Min	Minimum width required only when bypass is required.
BOTTOM OF RAMP					
Counter (gutter) Slope		5 %		Max	(Rare) If roadway is superelevated at crosswalk, running slope may be the same as superelevation
Gutter Cross Slope		2.1 %		Max	No greater than cross slope of crosswalk

Clear Area (in pavement) Run Slope	5 %	Max		Clear area applies to perpendicular curb ramps only. NOTE: "in pavement" is a mis-label... clear areas can be mostly within the setback / behind curb
Clear Area Cross Slope	2.1 %	Max		Clear area applies to perpendicular curb ramps only
Clear Area Width	4 ft	Min		Measured within crosswalk (or assumed lines if unpainted), outside of roadway travel lanes parallel to crosswalk
Clear Area Length	4 ft	Min		Within crosswalk, beyond bottom grade break of a perpendicular ramp
CROSSWALK				
Crosswalk Run Slope	5 %	Max		(Rare) If roadway is superelevated at crosswalk, running slope may be the same as superelevation
Crosswalk Cross Slope	2.1 %	Max		If Intersection Control is Light/Signal or None/Uncontrolled, cross slope no greater than 5%

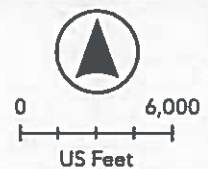
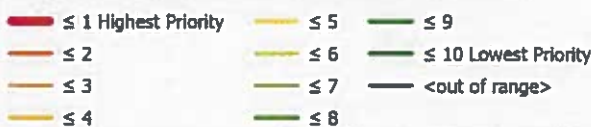
APPENDIX C

1. ADA Priority Map for Sidewalks
2. ADA Priority Map for Curb Ramps
3. Points of Interest and Walk-Time Analysis
4. Priority Summary for Sidewalks and Curb Ramps

Goshen Priority Sidewalk for Repair or Replacement



Location Weighted Condition Combined Score



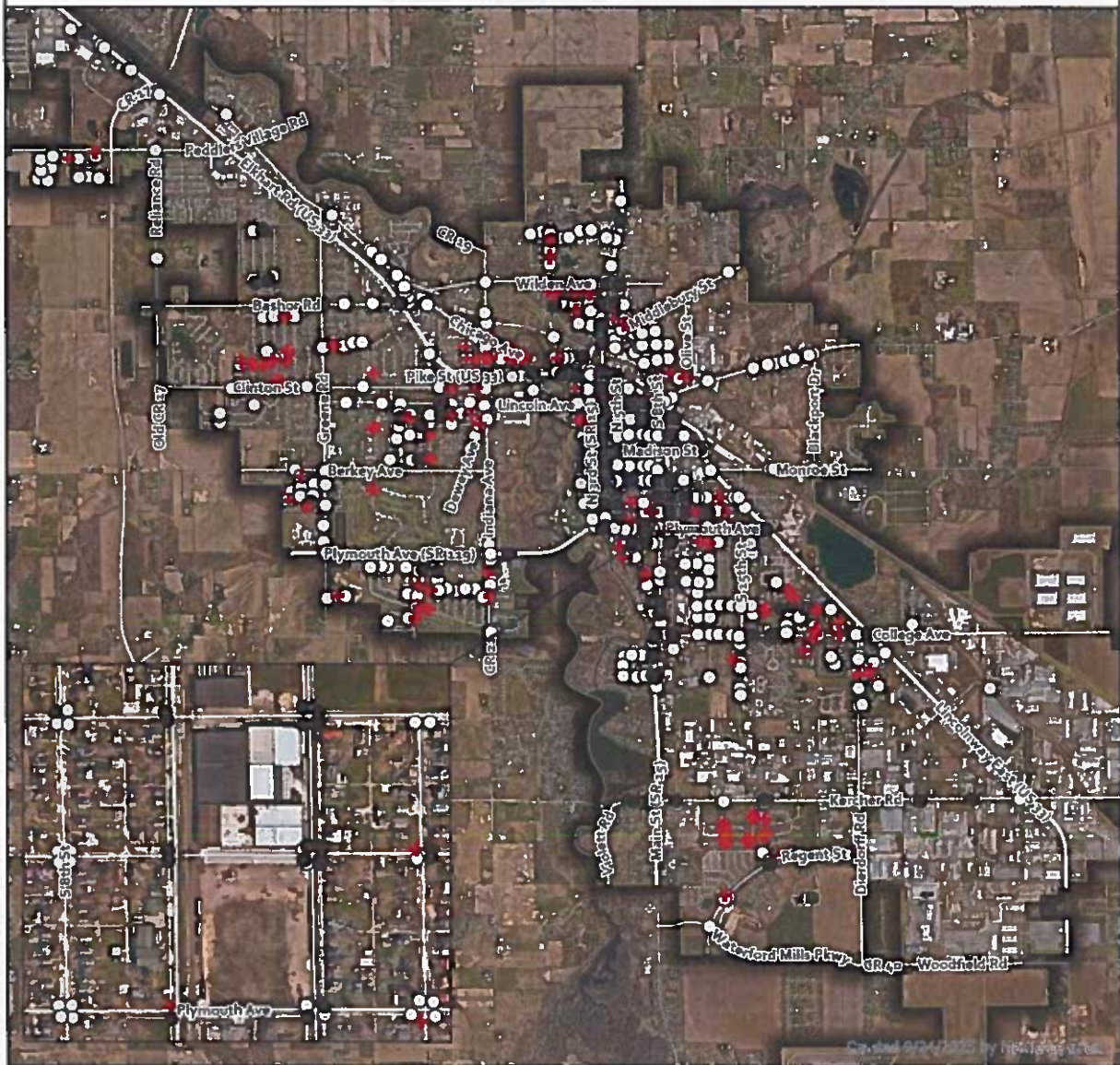
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The City of Goshen

Department of Public Works & Safety
Office of Engineering

204 East Jefferson Street, Goshen, Indiana 46528
Phone: 574-534-2201 engineering@goshencity.com

Goshen Curb Ramp ADA Compliance



ADA Compliant Ramps

- | | |
|--------------------------------|--------------------|
| ○ No | Missing Ramps |
| ○ Further Investigation Needed | + Curb Ramp Needed |
| ● Yes | |



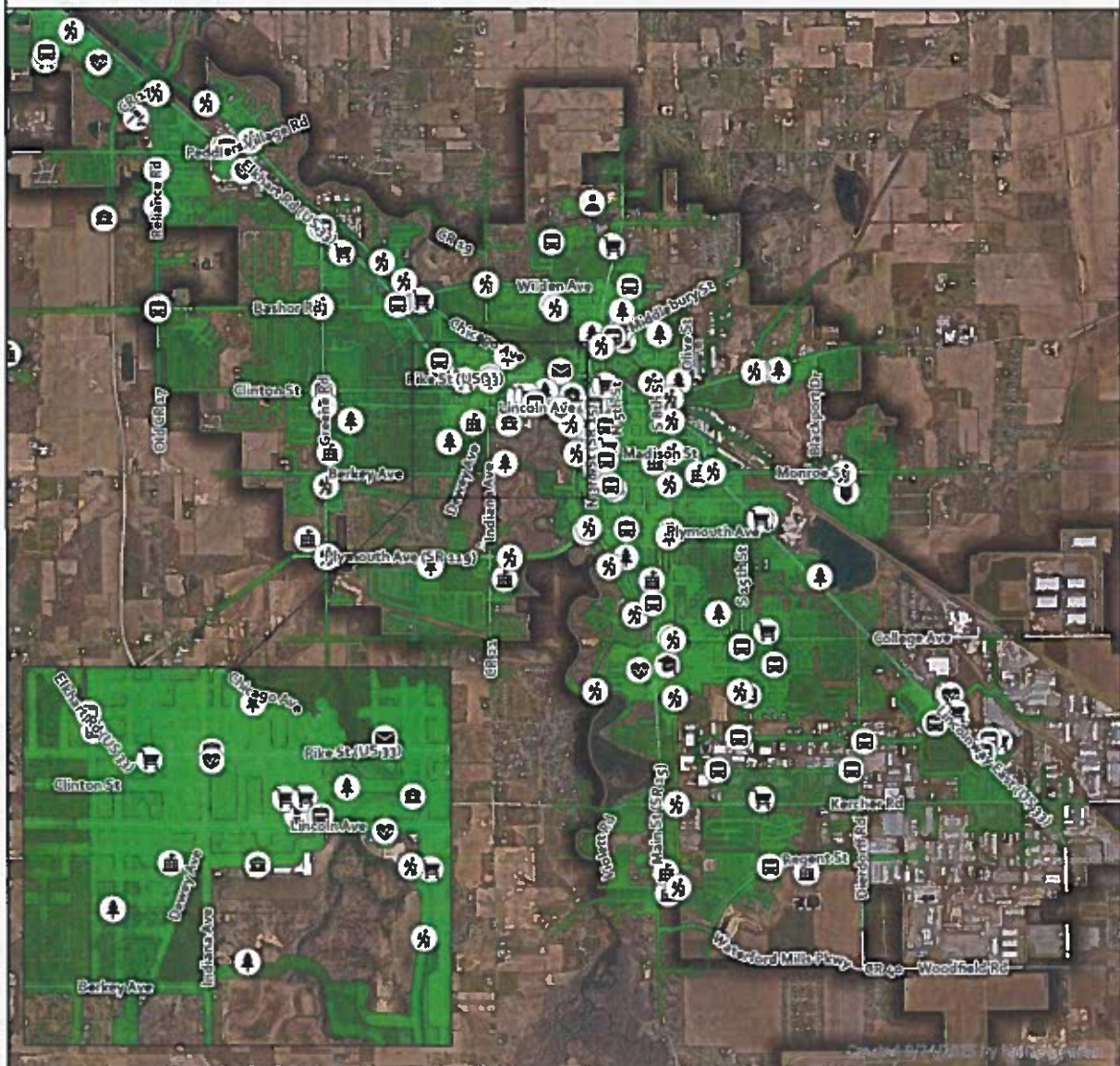
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The City of Goshen

Department of Public Works & Safety
Office of Engineering

204 East Jefferson Street, Goshen, Indiana 46528
Phone: 574-534-2201 engineering@goshencity.com

Goshen Points of Interest Proximity Analysis



Points of Interest

Points of Interest

- | | | | | |
|-------------|------------|----------------|------------|---------------|
| Bus Stop | Healthcare | School | Courthouse | Trailhead |
| College | Library | Social Service | Government | Park Entrance |
| Post Office | Land Mark | Grocery | | |

High Density of 5 Minute Proximity Walk Times

Low Density of 15 Minute Walk Time



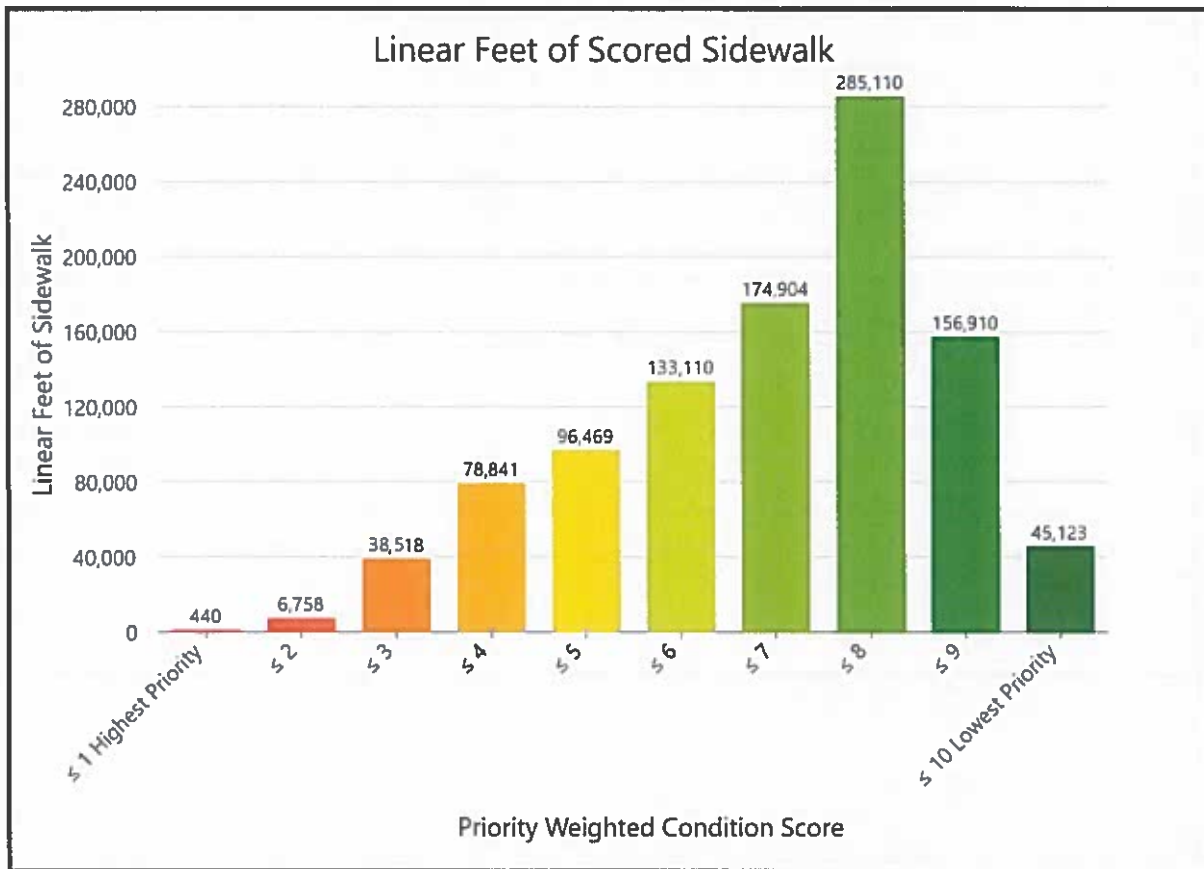
0 6,000
US Feet

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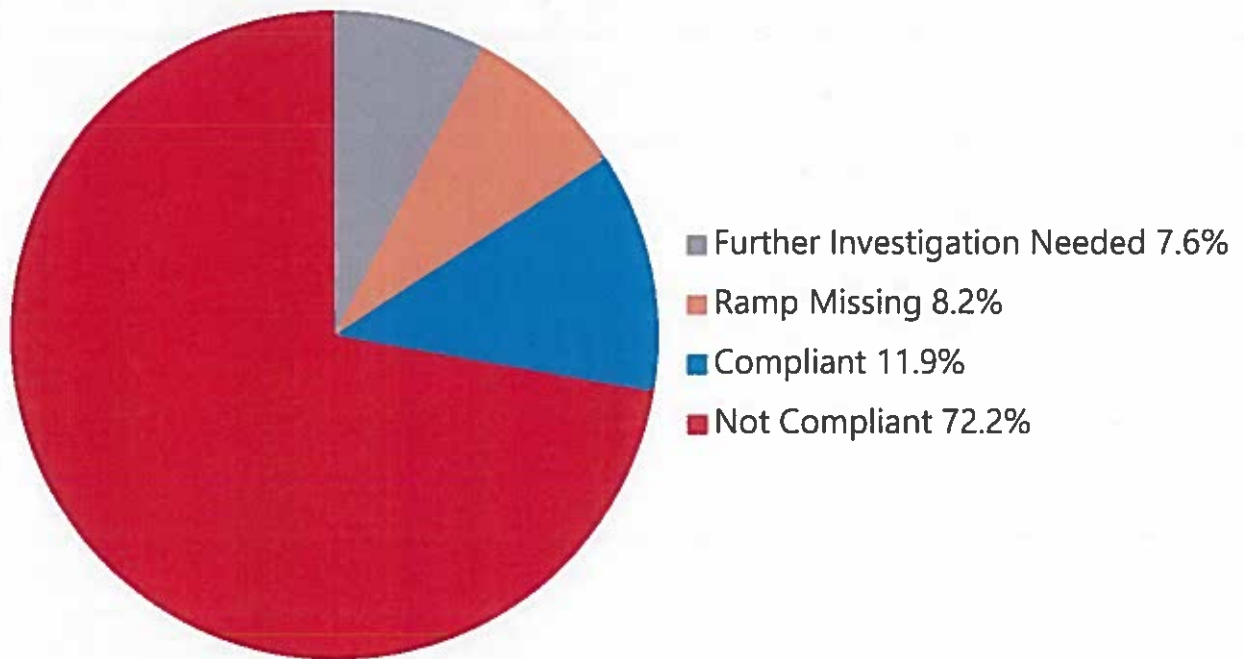
The City of Goshen

Department of Public Works & Safety
Office of Engineering

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Phone: 574-534-2201 engineering@goshencity.com



Curb Ramps by ADA Compliance



APPENDIX D

1. Resolutions

**GOSHEN BOARD OF PUBLIC WORKS AND SAFETY
RESOLUTION 2025-20**

**Adopting the Americans with Disabilities Act
Standards For Accessible Design and
Public Right-of-Way Accessibility Guidelines**

WHEREAS by Resolution 2011-Q adopted December 12, 2011, the Board of Public Works and Safety previously adopted the 2010 Americans with Disabilities Act Accessibility Guidelines Standards for Accessible Design and the 2011 Guidelines for Pedestrian Facilities in the Public Right-of-Way.

WHEREAS the 2011 Guidelines for Pedestrian Facilities in the Public Right-of-Way have been superseded by the Americans with Disability Act 2023 Public Right-of-Way Accessibility Guidelines ("PROWAG").

WHEREAS it is necessary for the City of Goshen to adopt PROWAG.

NOW, THEREFORE, BE IT RESOLVED by the Goshen Board of Public Works and Safety that the following City of Goshen Policy for Adopting the Americans with Disabilities Act Standards For Accessible Design and Public Right-of-Way Accessibility Guidelines attached hereto and made a part hereof, is hereby approved.

BE IT FURTHER RESOLVED by the Goshen Board of Public Works and Safety that, upon the approval of the above-described policy, Resolution 2011-Q, Adopting the Americans with Disabilities Act (ADA) Accessibility Guidelines for Standards for Accessible Design and the Guidelines for Pedestrian Facilities in the Public Right-of-Way is repealed.

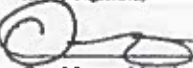
PASSED and ADOPTED by the Goshen Board of Public Works and Safety on July 31, 2025.



Gina M. Leichty, Mayor



Mary Nichols, Member



Orv Myers, Member



Michael A. Landis, Member

Barb Swartley, Member

CITY OF GOSHEN POLICY
Adopting the Americans with Disabilities Act
Standards For Accessible Design and
Public Right-of-Way Accessibility Guidelines

Adopted By: Board of Public Works and Safety
Date Adopted: July 31, 2025
Revised: N/A

Employees Affected: All Departments, Offices, and Employees

Section 1. Background.

- A. The Federal government enacted the Americans with Disabilities Act of 1990 ("ADA") to prevent discrimination of the physically and mentally disabled relating to employment and access to public facilities.
- B. Title II of the ADA requires that municipalities adopt the Americans with Disabilities Act 2010 Standards for Accessible Design that provide accessibility, through proposed structural modifications to remove accessibility barriers.
- C. Title II of the ADA recommends that municipalities adopt the Americans with Disability Act 2023 Public Right-of-Way Accessibility Guidelines ("PROWAG") for pedestrian facilities in the right-of-way that provide accessibility, through proposed structural modifications to remove accessibility barriers.
- D. The City of Goshen remains committed to the ADA and the elimination of barriers to public facilities.

Section 2. Policy.

The City of Goshen, Indiana hereby adopts for public rights-of-way the 2010 Americans with Disabilities Act Standards for Accessible Design and the 2023 Public Right-of-Way Accessibility Guidelines ("PROWAG") for pedestrian facilities in the right-of-way and will adhere to such and any subsequent revisions thereto.

Exhibit #2



Title VI Implementation Plan

September 2025

INTRODUCTION

The City of Goshen is committed to proactively meeting and exceeding the minimum compliance requirements established under Title VI of the Civil Rights Act of 1964, 49 CFR § 26, and all related anti-discrimination statutes and regulations. This **Title VI Implementation Plan** reflects our ongoing effort to ensure fairness, equity, and transparency in all programs and services.

Through this plan, the City of Goshen provides clear guidance for both internal staff and external partners regarding its Title VI program and nondiscrimination commitments.

City of Goshen Title VI Nondiscrimination Notice & Policy

The City of Goshen values and respects the civil rights of all individuals. We are committed to providing equitable opportunities and services to every resident of our community.

As a recipient of federal funds, the City of Goshen complies with **Title VI** and all related statutes, regulations, and directives. This means that no person will be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity receiving federal financial assistance on the basis of:

- Race
- Color
- Age
- Sex
- Sexual orientation
- Gender identity
- Disability
- National origin
- Religion
- Income status
- Limited English proficiency

Furthermore, the City of Goshen assures that nondiscrimination is upheld in all programs and activities, regardless of whether those programs receive federal funding.

Compliance with Federal Civil Rights Laws

It is the policy of the City of Goshen to fully comply with the following civil rights laws and directives, among others:

- Title VI and Title VII of the Civil Rights Act of 1964
- Age Discrimination Act of 1975
- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970
- Federal Aid Highway Act of 1973
- Title IX of the Education Amendments of 1972
- Section 504 of the Rehabilitation Act of 1973
- Civil Rights Restoration Act of 1987
- Americans with Disabilities Act of 1990
- Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)
- Executive Order 12898 (Environmental Justice in Minority and Low-Income Populations)
- Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency)

The Civil Rights Restoration Act of 1987 expanded the scope of Title VI coverage, making it clear that the nondiscrimination requirements apply to *all programs and activities* of federal-aid recipients, subrecipients, and contractors—whether those individual programs are federally funded.

Commitment to Accessibility and Inclusion

In compliance with Section 504 of the Rehabilitation Act of 1973, the City of Goshen assures that no qualified person with a disability will, solely because of their disability, be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination—including employment discrimination—under any program or activity receiving federal financial assistance.

The City also pledges to:

- Prevent discrimination in the impacts of programs, policies, and activities on minority and low-income populations.
- Take reasonable steps to ensure meaningful access to services for individuals with limited English proficiency (LEP).
- Regularly review, update, and incorporate nondiscrimination requirements into relevant manuals, directives, and regulations.

When distributing federal-aid funds to subrecipients, the City of Goshen includes Title VI language in all agreements to ensure compliance at every level.

Title VI and ADA Coordinator

The City of Goshen has designated the following individual to oversee Title VI compliance:

Rita Huffman
Title VI / ADA Coordinator
204 E Jefferson St, Suite 3
Goshen, Indiana 46528
humanresources@goshencity.com

Ms. Huffman is responsible for monitoring Title VI activities, preparing required reports, and ensuring compliance with federal nondiscrimination requirements. She also serves as the primary point of contact for individuals seeking additional information about the City's Title VI program or wishing to raise concerns or file complaints.

She is supported in these efforts by the Taskforce for Community Accessibility (TAC), which includes key staff from Engineering, Buildings & Grounds, the Mayor's Office and the Legal Department. The TAC works collaboratively to address compliance matters and ensure that accessibility issues are properly identified and resolved.

In addition, the City's Community Relations Commission provides another avenue to support equity, address concerns, and assist with Title VI compliance when needed.

Annual Affirmation

The City of Goshen affirms its commitment to nondiscrimination each year through the publication of its Annual Title VI Implementation Plan and Assurances of Nondiscrimination. These documents serve as a public declaration of our ongoing responsibility to uphold civil rights protections and equitable treatment for all.

TITLE VI ASSURANCES & IMPLEMENTATION

Fully executed Goshen Assurances are included in Appendix A and integrated into this document. This Title VI Implementation Plan, dated September 25, 2025, has been approved by the Goshen Board of Public Works & Safety, is being implemented, and is being adhered to by the City of Goshen. This plan will be renewed and updated on or before September 1, 2026.

Signed by: _____
Gina Leichty, Mayor

Date: _____

The individual above is a duly authorized representative of the City of Goshen.

Organizational Structure and Responsibilities

The organizational chart included on the following page of this plan illustrates the placement of the Title VI/ADA Coordinator within the City of Goshen's administrative structure. The purpose of this chart is to clearly identify lines of authority, responsibility, and communication for implementing and monitoring Title VI compliance.

The chart demonstrates how Title VI responsibilities are integrated throughout City departments and shows the reporting relationship between the Title VI/ADA Coordinator, department heads, and executive leadership. This structure ensures accountability, supports coordination across departments, and provides transparency for the public, state, and federal oversight agencies.

While specific employees may change, the organizational structure remains consistent.

Civil City



City of Goshen – Title VI Program Overview

Data Collection, Analysis, and Reporting

The City of Goshen collects and analyzes data to ensure compliance with Title VI and to monitor for any potential inequities. The type of data collected depends on the program area and its objectives. In some cases, information is collected on a trial basis to determine what data will be most useful in the long term.

Currently, the City collects the following types of data:

- Complaints received, logged, processed, and investigated
- Environmental Justice (EJ) analyses and reports
- Limited English Proficiency (LEP) reports
- Records of Title VI trainings
- Public involvement surveys
- Meeting minutes and discussions related to Title VI across all program areas
- Program-specific data reviewed annually to assess potential disparate impacts or discriminatory outcomes

Complaints of Discrimination

How to File a Complaint

Individuals may submit complaints in several ways; however, to officially begin the process, a signed original copy must be mailed to the Title VI Coordinator. Persons with disabilities may request to file complaints in an alternative format. The City does not require the use of its official complaint form, although one is available.

Direct all Title VI-related complaints to:

Rita Huffman
Title VI Coordinator
204 E Jefferson St, Suite 3
Goshen, IN 46528
humanresources@goshencity.com

Elements of a Complete Complaint

A complete complaint must:

1. Be written and signed. (Verbal complaints will be documented in writing and confirmed by the complainant's signature.)
2. Include the full name and address of the complainant.
3. Identify the respondent (the individual, agency, department, or program alleged to have discriminated).
4. Describe the alleged act(s) of discrimination, including dates and the basis (race, color, national origin, sex, age, or disability).

Complaint forms are available through the Title VI Coordinator's office and on the City's website at www.goshenindiana.org.

Complaint Processing Procedure

The Title VI Coordinator is responsible for receiving and processing complaints. The process includes:

- **Initial Review:** Ensuring the complaint is complete, filed within 180 days of the alleged act, and falls under the City's jurisdiction.
- **Investigation:** Conducted by the Coordinator and TAC, unless the complaint is against the City itself. In that case, the Mayor's Office or a designee will investigate, with the City Attorney also notified.
- **Notifications:** The complainant and respondent will be notified in writing by certified mail. Notices will identify the assigned investigator.
- **Interviews:** The respondent may be asked to participate in an interview as part of the investigation.
- **Review:** Legal counsel may provide recommendations, which will be considered by the Coordinator, the Board of Public Works, and the Mayor's Office.
- **Resolution:** Once findings are complete, the City will issue a final resolution and notify all parties.
- **Appeals:** If dissatisfied, the complainant may appeal the City's decision within 180 days. Appeals are only considered if new, previously unavailable facts are presented.

This process follows the U.S. Department of Justice guidance outlined in *Investigation Procedures Manual for the Investigation and Resolution of Complaints Alleging Violations of Title VI and Other Nondiscrimination Statutes*, available at: [DOJ Title VI Manual](#).

Environmental Justice (EJ) Analysis and Reports

Title VI requires federal agencies and recipients of federal funds to ensure programs and activities do not discriminate based on race, color, or national origin, particularly regarding health and environmental impacts.

The three guiding principles of Environmental Justice are:

1. Avoid, minimize, or mitigate disproportionately high and adverse health or environmental effects on minority and low-income populations.
2. Ensure full and fair participation by all potentially affected communities in decision-making.
3. Prevent the denial, reduction, or delay of benefits to minority and low-income populations.

The City of Goshen is committed to applying these principles in all of its programs and projects.

Limited English Proficiency (LEP) Policy

Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*, requires recipients of federal funds to ensure meaningful access for individuals with limited English skills. The City of Goshen follows the U.S. Department of Transportation's four-factor analysis to assess LEP needs:

1. **Population:** The number and proportion of LEP individuals in the service area.
2. **Frequency:** How often LEP individuals interact with City programs or services.

3. **Importance:** The significance of the program or service to LEP populations.
4. **Resources:** The resources available to the City relative to costs.

Findings

- Approximately 8,000 Goshen residents (age 5+) speak a language other than English. Spanish is the largest LEP group (20.9% of the population).
- Contact with LEP individuals has been limited, and no interpreter requests have been made to date.
- Transportation services are particularly critical for many LEP residents, enabling access to healthcare, food, and community resources.
- The City partners with community organizations for interpretation/translation services and provides many brochures and program materials in Spanish.

Safe Harbor Provision

The City translates vital documents into any language where at least 5% of the county population both (1) does not speak English well and (2) primarily speaks another language.

LEP Accommodation Plan

- Translation of vital documents and interpretation services will be provided as needed.
- Staff have access to the U.S. Census "I Speak" documents to help identify language needs.
- Public involvement surveys collect demographic information to monitor changes in LEP populations. Surveys are retained for three years.
- Employees receive training on meaningful access requirements, with updates provided as needed.

Title VI Training and Employee Responsibilities

- **At Hire:** All new employees receive Title VI policy education and materials during orientation and sign an acknowledgment of receipt.
- **Ongoing Training:** Employees receive annual training and periodic updates as needed. Training may be delivered in person or through other approved methods. Moving into 2026, the City is evaluating different training options to better train for Title VI and ADA compliance and details on the training will be provided in the 2026 report.

Employees are expected to:

- Uphold Title VI policy and remove barriers to public access.
- Take prompt action to avoid or minimize potential discrimination.
- Report any Title VI concerns or complaints in writing to the Coordinator.

Public Involvement and Data Collection

The City collects demographic data to monitor nondiscrimination efforts, including voluntary public involvement surveys at hearings and meetings. Surveys are anonymous and ask about gender, ethnicity, race, age, income, and disability status. The City will be making announcements at meetings to explain the survey's purpose and encourage more participation moving forward. In addition, we are evaluating the use of online surveys to broaden our reach.

The Title VI Coordinator maintains survey data and other records (e.g., complaints, language service requests, federally funded projects, and compliance reviews) for at least three years.

To date, there have been no complaints made since 2017 when we began tracking.

Community Involvement and Outreach

The City of Goshen is committed to respectful and inclusive community engagement. Public meetings and activities are open to all residents, accessible to individuals with disabilities, and translators or auxiliary aids are available upon request (requests must be made at least 48 hours in advance).

Meeting agendas, minutes, notices, and events are published on the City's website. Departments are also using signage, media, and social media to engage the community.

Review of Program Areas and Annual Work Plan

Over the next year, the City of Goshen will be working diligently to more fully evaluate services, ensuring that we're able to develop meaningful annual goals to ensure Title VI compliance across all departments. Program areas and policies will be reviewed for potential disparate impacts or discriminatory outcomes. These priorities will be updated annually and tracked for accountability.

APPENDICES

The following appendices provide supporting documentation for the City of Goshen's Title VI Implementation Plan. These materials are included to ensure transparency, demonstrate compliance with federal and state nondiscrimination requirements, and provide resources for both City staff and the public.

Some appendices are required under Title VI regulations, while others are included to highlight best practices and strengthen the City's commitment to equity, accessibility, and nondiscrimination. Together, they serve as a record of the City's efforts to uphold the principles of Title VI and related civil rights laws.

Appendix A – Title VI Assurances

Appendix B – Non-Discrimination Policy

Appendix C – Non-Discrimination Public Notice

Appendix D – Non-Discrimination Grievance Procedure

Appendix E – Grievance Form

Appendix F – Grievance Log

Appendix G - Public Involvement Survey

Appendix F – 'I Speak' Cards

Appendix G – Training Materials & Records of Training Attendance

Appendix H – Reports & Outcomes of Data Collected

Appendix I – Annual Goals & Accomplishments

APPENDIX A

Title VI Assurances

RESOLUTION 2017-12

TITLE VI ASSURANCES CITY OF GOSHEN, INDIANA

NOW, THEREFORE, BE IT RESOLVED by the Goshen Board of Public Works and Safety that:

The City of Goshen (hereinafter referred to as the "Recipient") AGREES THAT it will comply with the Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 (hereinafter referred to as the Act), and all the requirements imposed by or pursuant to Title 49, Code of Federal Regulations (CFR), Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964, Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes-Implementation and Review Procedures (hereinafter referred to as Regulations) and other pertinent nondiscrimination authorities and directives, to the end that in accordance with the Act, Regulations, and other pertinent nondiscrimination authorities and directives, no person in the United States shall, on the grounds of race, color, or national origin, sex (23 US 324), age (42 USC 6101), disability/handicap (29 USC 790) and low income (Executive Order 12898) be excluded from participation in, be denied the benefits of, or otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement.

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

1. That the Recipient agrees that each "program" and each "facility" as defined in 49 CFR subsections 21.23(e) and (b) and 23 CFR 200.5(k) and (g) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all the requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all the solicitations for bids for work or material subject to the Regulations and made in connection with all Federal-Aid Highway Programs and, in adapted form in all proposals for negotiated agreements:

The Recipient in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally assisted programs of the Department of Transportation and Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes, issued pursuant to such Acts, hereby notifies all bidders that it will affirmatively ensure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, sex, sexual orientation, gender identity, age, disability/handicap, religion and/or low income in consideration for an award.

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

Passed and adopted by the Board of Public Works and Safety on April 17, 2017.


Jeremiah P. Stutsman, Mayor


Michael A. Landis


Mitch Day

APPENDIX A

The City of Goshen will require the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "contractor") to agree as follows:

- (1) **Compliance with Regulations:** The contractor shall comply with the Regulation relative to nondiscrimination in Federally-assisted programs of the Department of Transportation (hereinafter, "DOT") Title 49, Code of Federal Regulations, Part 21, and the Federal Highway Administration (hereinafter "FHWA") Title 23, Code of Federal Regulations, Part 200 as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.
- (2) **Nondiscrimination:** The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, or national origin, sex, age, and disability/handicap and low income in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by 49 CFR, section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
- (3) **Solicitations for Subcontractors, 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 shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin, sex, age, and disability/handicap and low income.
- (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 Indiana Department of Transportation (INDOT) or the FHWA to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information the contractor shall so certify to INDOT or the FHWA as appropriate, and shall set forth what efforts it has made to obtain the information.
- (5) **Sanctions for Noncompliance:** In the event of the contractor's noncompliance with the nondiscrimination provisions of this contract, INDOT shall impose such contract sanctions as it or FHWA may determine to be appropriate, including, but not limited to:
 - (a) withholding of payments to the contractor under the contract until the contractor complies, and/or
 - (b) cancellation, termination, or suspension of the contract, in whole or in part.
- (6) **Incorporation of Provisions:** The contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurements 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 subcontract or procurement as INDOT or the FHWA may direct as a means of enforcing such provisions including sanctions for non-compliance: 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 Indiana Department of Transportation to enter into such litigation to protect the interests of the Indiana Department of Transportation and, in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

APPENDIX B

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

(GRANTING CLAUSE)

NOW, THEREFORE, the City of Goshen as authorized by law, and upon the condition that the City of Goshen will accept title to the lands and maintain the project constructed thereon, in accordance with Title 23, United States Code of Federal Regulations, the Regulations for the Administration of Federal-Aid Highway Programs and the policies and procedures prescribed by FHWA, also in accordance with and in compliance with all 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 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 _____ all the right, title and interest of the Department of Transportation in and to said lands described in Exhibit "A" attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto the City of Goshen 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 City of Goshen its successors and assigns.

The City of Goshen, 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 religion, race, color, or national origin, sex, sexual orientation, gender identity, age, and disability/handicap, and low income be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over or under such lands hereby conveyed [,] [and]* (2) that the City of Goshen shall use the lands and interests in lands and interests in the lands so conveyed, in compliance with all 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 [,] and (3) that in the event of breach of any of the above-mentioned nondiscrimination conditions, the City of Goshen shall have a right to re-enter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the City and its assigns as such interest existed prior to this instruction.¹

¹ Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

APPENDIX C

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the City of Goshen pursuant to the provisions of Assurance 7(a) as applicable.

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation program or activity is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964, Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes—Implementation and Review Procedures, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.]:

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

[Include in deed]:

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

The following shall be included in all deeds, licenses, leases, permits, or similar agreements entered into by INDOT pursuant to the provisions of Assurance 7(b).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his 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 grounds of race, color, or national origin, sex, age, disability/handicap, and low income shall be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over or under such land and the furnishing of services thereon, no person on the ground of race, color, or national origin, sex, age, disability/handicap and low income, shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) shall 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

² Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

1964, Title 23 Code of Federal Regulations, Part 200, Title VI Program and Related Statutes—Implementation and Review Procedures, and as said Regulations may be amended.

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

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

[Include in deeds]³

That in the event of breach of any of the above nondiscrimination covenants, the City shall have the right to re-enter said land and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of the City and its assigns.

³ Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

APPENDIX B

Non-Discrimination Policy

NON-DISCRIMINATION

Adopted By: Board of Public Works and Safety

Date Adopted: April 22, 1996 (Non-Discrimination in Employment); January 27, 1992 (ADA Coordinator)

Revised: April 17, 2017; January 24, 2022; February 14, 2022

Employees Affected: All Departments, Offices, and Employees

Section 1. Background

- A. Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d) provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance.
- B. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. §794) provides that no otherwise qualified individual with a disability in the United States shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.
- C. Section 162(a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. §324) provides that no person shall on the ground of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance under this title [Title 23, United States Code] or carried on under this title [Title 23, United States Code].
- D. The Age Discrimination Act of 1975 (42 U.S.C. §6102) provides that no person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance.
- E. The Civil Rights Restoration Act of 1987 (PL 100-259) amended Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975 to clarify that a recipient of Federal financial assistance must comply with the civil rights laws in all operations of the recipient and not just the program or activity receiving the Federal funding.
- F. Title II of the Americans with Disabilities Act of 1990 (42 U.S.C. §12132) provides that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.
- G. Presidential Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires Federal agencies to

administer and implement its programs, policies, and activities that affect human health or the environment so as to identify and avoid "disproportionately high and adverse" effects on minority and low-income populations.

- H. Presidential Executive Order 13166, Improving Access to Services for Persons With Limited English Proficiency, requires recipients of Federal financial assistance to provide meaningful access to programs and activities for persons who, as a result of national origin, are limited in their English proficiency.

Section 2. **Discrimination Prohibited.**

- A. The City of Goshen is an equal opportunity employer and shall comply with and uphold all federal laws and administrative guidelines prohibiting discrimination on the basis of race, color, religion, sex, gender identity, age, gender, disability, ancestry, genetic information, or national origin. It is the policy of the City of Goshen that no employee or applicant for employment shall be discriminated against, excluded from participating in, denied the benefits of, or otherwise subjected to discrimination in any program, activity or other privilege of employment based on the above causes of prejudice.
- B. It shall be the policy of the City of Goshen, Indiana that no person shall, on the grounds of race, color, national origin, sex, age, income status, or limited English proficiency be excluded from participation in, be denied the benefits of, or be subject to discrimination under any of the City of Goshen's services, programs, or activities.
- C. It shall be the policy of the City of Goshen, Indiana that will not discriminate against a qualified individual with a disability in job application procedures; the hiring, advancement or discharge of employees; employee compensation; job training; and other terms, conditions, and privileges of employment. Further, no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of the City of Goshen, or be subjected to discrimination by the City.

Section 3. **Notices.**

- A. Notice of Nondiscrimination. The City of Goshen Notice of Nondiscrimination attached to this policy is the City of Goshen's notice to inform applicants, participants, beneficiaries, and other interested persons of the protections against discrimination assured by this policy in the services, programs, and activities of the City.
- B. Notice under the Americans with Disabilities Act. The City of Goshen Notice under the Americans with Disabilities Act attached to this policy is the City of Goshen's notice to inform applicants, participants, beneficiaries, and other interested persons of the protections against discrimination assured by the Title II of the Americans with Disabilities Act and this policy in the services, programs, or activities of the City.
- C. The Notice of Nondiscrimination and Notice under the Americans with Disabilities Act shall be provided to the public by posting at all City of Goshen facilities open to the public, distributing to all City of Goshen departments and offices, publishing on the City

of Goshen's website, and presenting in other accessible formats as may be determined from time to time.

Section 4. **Title VI Coordinator and ADA Coordinator.**

The City of Goshen Human Resources Manager is designated as the Title VI Coordinator and ADA Coordinator. The Title VI Coordinator and ADA Coordinator is responsible for coordinating the efforts of the City of Goshen to comply with the Nondiscrimination Statutes/Rules/Regulations/Policies and to assist in processing any complaint communicated to the City alleging discrimination. The Title VI Coordinator and ADA Coordinator may be contacted at:

City of Goshen Human Resources Department
Attention: Title VI Coordinator and ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Phone: (574) 534-8475
TDD: (574) 534-3185
Fax: (574) 534-2410
Email: humanresources@goshencity.com

Section 5. **Grievance Procedure.**

- A. The City of Goshen Grievance Procedure under the Americans with Disabilities Act and Nondiscrimination Policy attached to this policy is the City of Goshen's process for a person to file a complaint of alleged discrimination.
- B. This grievance procedure shall be provided to the public by posting at all City of Goshen facilities open to the public, distributing to all City of Goshen departments and offices, publishing on the City of Goshen's website, and presenting in other accessible formats as may be determined from time to time.
- C. The Title VI Coordinator and ADA Coordinator shall maintain documentation of all complaints received alleging discrimination, resolutions provided, hearings requested, and other pertinent information for at least three (3) years.

Section 6. **Title VI Program/Nondiscrimination Implementation Plan**

The Goshen Board of Public Works and Safety shall adopt and annually update a Title VI Program/ Nondiscrimination Implementation Plan to ensure continuous compliance with Nondiscrimination Statutes/Rules/Regulations and the City's Nondiscrimination Policy. The Title VI Program/Nondiscrimination Implementation Plan shall include, but is not limited to:

- A. This policy, including the current notices, Title VI Coordinator and ADA Coordinator information, and grievance procedures.
- B. Monitoring of program participants and beneficiary demographics and activities promoting compliance with the Title VI Program.
- C. Process and procedures for handling complaints alleging discrimination.
- D. Title VI training of staff.

- E. Title VI Assurances document.
- F. Annual work plan of Title VI activities and actions.
- G. Annual accomplishment report highlighting efforts to ensure nondiscrimination practices in all City of Goshen activities.

Section 7. Miscellaneous

- A. The notices and grievance procedure under this policy shall be updated as needed with the name of the current individual employed as the Human Resources Manager and designated as the Title VI Coordinator and ADA Coordinator without amending this resolution.
- B. Resolution 2011-Q, A Resolution of the City of Goshen Board of Public Works and Safety Adopting the Americans with Disabilities Act (ADA) Accessibility Guidelines for Standards for Accessible Design and Guidelines for Pedestrian Facilities in the Public Right-of-Way, adopted December 12, 2011 continues in full force and effect.
- C. Resolution 2012-J, Adopting the Americans with Disabilities Act Transition Plan for Pedestrian Facilities in the Public Right-of-Way, adopted July 9, 2012, continues in full force and effect.

APPENDIX C
Non-Discrimination Public Notice



CITY OF GOSHEN NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT ("ADA")

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Goshen, Indiana will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: The City of Goshen does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the US Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: The City of Goshen will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the its programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The City of Goshen will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in the City's offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the City of Goshen should contact the ADA Coordinator, using the contact information below, as soon as possible but no later than forty-eight (48) business hours before the scheduled event. The City of Goshen will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs. The ADA does not require the City of Goshen to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of the City of Goshen is not accessible to persons with disabilities should be directed to the ADA Coordinator by contacting:

City of Goshen Human Resources Department
Attention: Rita Huffman, ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Phone: (574) 534-8475
TDD: (574) 534-3185
Fax: (574) 534-2410
Email: humanresources@goshencity.com



CITY OF GOSHEN
NOTICE OF NONDISCRIMINATION

In accordance with the requirements of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 162(a) of the Federal-Aid Highway Act of 1973, the Age Discrimination Act of 1975, the Civil Rights Restoration Act of 1987, other federal nondiscrimination statutes and executive orders, and the City of Goshen Nondiscrimination Policy, the City of Goshen, Indiana will not exclude a person from participating in, deny a person the benefits of, or discriminate against any person on the basis of race, color, national origin, sex, age, disability/handicap, income status, or limited English proficiency in the City's services, programs, or activities.

Grievance Procedure: Complaints that a person has been excluded from participation in, denied the benefits of, or subjected to discrimination on the grounds of race, color, national origin, sex, age, disability/handicap, income status, or limited English proficiency under any of the City of Goshen's services, programs, or activities should be directed to the Title VI Coordinator by contacting:

City of Goshen Human Resources Department
Attention: Rita Huffman, Title VI Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Phone: (574) 534-8475
TDD: (574) 534-3185
Fax: (574) 534-2410
Email: humanresources@goshencity.com

APPENDIX D

Non-Discrimination Grievance Procedure



**CITY OF GOSHEN GRIEVANCE PROCEDURE UNDER
THE AMERICANS WITH DISABILITIES ACT
AND
NONDISCRIMINATION POLICY**

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA") and the City of Goshen's Nondiscrimination Policy. It may be used by anyone who wishes to file a complaint alleging:

- (1) Discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Goshen; or
- (2) Exclusion from participation in, denial of the benefits of, or discrimination under any of the City of Goshen's services, programs, or activities on the basis of race, color, national origin, sex, age, disability/handicap, income status, or limited English proficiency.

The City of Goshen's Discrimination and Harassment Policy, as may be amended from time to time, governs job-related complaints of discrimination in employment with the City of Goshen.

The complaint should be in writing and contain information about the alleged discrimination, including:

- (1) Name, address and phone number of the person alleging the discrimination.
- (2) Name, address and phone number of person filing the complaint if different from the person alleging the discrimination.
- (3) Description of the alleged discrimination, including date and location, and the remedy sought.

Anyone wishing to file a complaint may use the Grievance Form included with this Grievance Procedure. The Grievance Form is also available on the City of Goshen's website at www.goshenindiana.org. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for a person with a disability upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than sixty (60) calendar days after the alleged violation to:

City of Goshen Human Resources Department
Attention: Rita Huffman, Title VI Coordinator and ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Fax: (574) 534-2410
Email: humanresources@goshencity.com

The Title VI Coordinator and ADA Coordinator will acknowledge the receipt of the complaint within ten (10) working days.

The Title VI Coordinator and ADA Coordinator will forward the complaint to the City of Goshen's Legal Department which will conduct the investigation necessary to determine the validity of the alleged discrimination. The Legal Department may contact the grievant to discuss the matter as part of the investigation. The Legal Department will submit written findings and a proposed resolution within forty-five (45) calendar days of receiving the complaint from the Title VI Coordinator and ADA Coordinator. If a resolution of the complaint is reached during this investigation, the resolution will be documented in Title VI Coordinator and ADA Coordinator's file.

If the grievant is not satisfied with the Legal Department's determination, the grievant may request a hearing before the Goshen Board of Public Works and Safety. The hearing will be scheduled within thirty (30) days of the request unless the grievant and City agree on a different date. The request for a hearing before the Board of Public Works and Safety must be requested with fifteen (15) days of receiving the Legal Department's written findings and proposed resolution. At the hearing the grievant may appear with or without legal counsel. The grievant will be given the opportunity to present evidence, and/or witnesses and will be given the opportunity to question any witnesses that the City presents to the Board of Public Works and Safety.

The resolution of any specific complaint will require consideration of the specific nature of the alleged discrimination, the nature of the access to services, programs, activities, or facilities at issue, the essential eligibility requirements for participation, the health and safety of others, and the degree to which an accommodation would constitute a fundamental alteration to the program, service, activity, or facility or cause undue hardship to City. Accordingly, the resolution of any complaint does not create a precedent for any future complaint.

At any time during the process, a grievant may file a complaint directly with the US Department of Justice, Indiana Civil Rights Commission, or other appropriate state or federal agency. All written complaints received by the Title VI Coordinator and ADA Coordinator or his/her designee, appeals to the Goshen Board of Public Works and Safety or the Board's designee, and responses from these two offices will be retained by the City of Goshen for at least three (3) years.

APPENDIX E

Grievance Form



CITY OF GOSHEN GRIEVANCE FORM

Date: _____

Name of Person Alleging Discrimination: _____

Address: _____

City _____ State: _____ Zip Code: _____

Phone Number: _____

Email: _____

Name of Person Filing Complaint (if different than above) _____

Address: _____

City _____ State: _____ Zip Code: _____

Phone Number: _____

Email: _____

Description of the alleged discrimination, including date and location: _____

Remedy sought: _____

Return to: City of Goshen Human Resources Department
Attention: Rita Huffman, Title VI Coordinator and ADA Coordinator
204 East Jefferson Street, Suite 3
Goshen, Indiana 46528
Fax: (574) 534-2410
Email: humanresources@goshencity.com

APPENDIX F

Grievance Log

[illegible][illegible]

APPENDIX E

Public Involvement Survey



Title VI Community Involvement Survey

The City of Goshen is committed to ensuring that all community members have the opportunity to participate in planning, programs, and services, regardless of race, color, national origin, sex, age, disability, or income status. Your feedback will help us improve outreach and ensure inclusive public participation.

Participation in this survey is voluntary.

The information you provide is confidential and will only be reported in summary form.

1. How did you hear about this meeting/event/project?

- ☐ City of Goshen website
- ☐ Social media (Facebook, Instagram, etc.)
- ☐ Newspaper/Radio
- ☐ Word of mouth
- ☐ Community organization
- ☐ Other (please specify): _____

2. Did you feel that you had adequate opportunity to provide input?

- ☐ Yes
- ☐ No

If no, please explain: _____

3. What is the best way for the City of Goshen to notify you about public meetings, projects, or services?

- ☐ Email
- ☐ Postal mail
- ☐ Social media
- ☐ Local newspaper/radio
- ☐ Text message
- ☐ Community partner/organization
- ☐ Other: _____

4. Demographic Information *(optional)*

Providing this information is optional, but it helps the City ensure compliance with Title VI and evaluate whether all community members are being reached.

a. Race/Ethnicity (check all that apply):

- ☐ American Indian or Alaska Native
- ☐ Asian
- ☐ Black or African American
- ☐ Hispanic or Latino
- ☐ Native Hawaiian or Other Pacific Islander
- ☐ White
- ☐ Other: _____

b. Primary Language Spoken at Home:

- ☐ English
- ☐ Spanish
- ☐ Burmese
- ☐ Ukrainian
- ☐ Other (please specify): _____

c. Do you need translation or interpretation services to participate fully in City programs or events?

- ☐ Yes
- ☐ No

d. Age:

- ☐ Under 18
- ☐ 18–24
- ☐ 25–44
- ☐ 45–64
- ☐ 65 and over

e. Do you identify as a person with a disability?

- ☐ Yes
- ☐ No
- ☐ Prefer not to answer

5. Additional Comments or Suggestions:

Thank You! Your participation ensures that the City of Goshen's programs and services are inclusive and accessible to all.

APPENDIX F

'I Speak' Card

A

AMHARIC

እኔ አማርኛ መናገር

ARABIC

أنا أتحدث اللغة العربية

ARMENIAN

Ես խոսում եմ հայերեն ես

B

BENGALI

আমি বাংলা কথা বলতে পারি

BOSNIAN

Ja govorim bosanski

BULGARIAN

Аз говоря български

BURMESE

ကျွန်တော်/ကျွန်မ မြန်မာလို ပြောတတ်ပါတယ်

C

CAMBODIAN

ខ្ញុំនិយាយភាសាខ្មែរ

CANTONESE

我講廣東話 traditional

我讲广东话 simplified

CATALAN

Parlo català

CHIN

Lai Tong ka ton—Falam chin

Lai Holh Ka thiam—Hakha chin

Zo bya ka thya—Zo tung Chin

CROATIAN

Govorim hrvatski

CZECH

Mluvím česky

D

DANISH

Jeg taler dansk

DARI

من دری حرف می زنم

DUTCH

Ik spreek Nederlands

E

ESTONIAN

Ma räägin eesti keelt

F

FARSI

من فارسی صحبت می کنم.

FINNISH

Puhun suomea

FRENCH

Je parle français

G

GERMAN

Ich spreche Deutsch

GREEK

Μιλώ στα ελληνικά

GUJARATI

હું ગુજરાતી બોલું છું

H

HAITIAN CREOLE

M pale kreyòl ayisyen

HEBREW

אני מדבר עברית masculine
אני מדברת עברית feminine

HINDI

मैं हिंदी बोलता हूँ ।

HMONG

Kuv hais lus Hmoob

HUNGARIAN

Beszélek magyarul

I

ICELANDIC

Ég tala íslensku

ILOCANO

Agsaonak ti Ilokano

INDONESIAN

saya bisa berbahasa Indonesia

ITALIAN

Parlo italiano

J

JAPANESE

私は日本語を話す

K

KACKCHIQUEL

Quin chagüic' ká chabal' ruin' rí
tzújon cakchiquel

KAREN

ယကတိကညိကိန်

KIRUNDI

Ndavuga Ikirundi
Nvuga Ikirundi

KOREAN

나는 한국어로 이야기

KURDISH

man Kurdii zaanim

KURMANCI

man Kurmaanji zaanim

L

LAOTIAN

ຂ້າພະເຈົ້າເວົ້າພາສາລາວ

LATVIAN

Es runāju latviski

LITHUANIAN

Aš kalbu lietuviškai

M

MANDARIN

我講國語

traditional

我讲国语/普通话

simplified

MAM

Bán chiyola tuj kíyol mam

MON

འོ་ཁྱི་འགྲོ་ཡང་

N

NEPALI

म नेपाली बोल्न

NORWEGIAN

Jeg snakker norsk

P

PERSIAN

من فارسی صحبت می کنم.

POLISH

Mówię po polsku

PORTUGUESE

Eu falo português do Brasil
for Brazil

Eu falo português de Portugal for
Portugal

PUNJABI

ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ।

Q

Q'ANJOB'AL

Ayin tí chí walq' anjob' al

QUICHE

In kinch'aw k'u'in ch'e quiche

R

ROMANIAN

Vorbesc românește

RUSSIAN

Я говорю по-русски

S

SERBIAN

Ja govorim srpski

SIGN LANGUAGE (AMERICAN)



I, ME



SIGN, SIGN LANGUAGE

SINHALESE

මම සිංහල කතා කළ හැකිය

SLOVAK

Hovorím po slovensky

SLOVENIAN

Govorim slovensko

SOMALI

Waan ku hadlaya af-Soomaali

SPANISH

Yo hablo español

SWAHILI

Ninaongea Kiswahili

SWEDISH

Ja talar svenska

T**TAGALOG**

Marunong akong man-Tagalog

TAMIL

நான் தமிழ் பேச
India

நான் தமிழ் கதைப்பேன்
Sri Lanka

THAI

พูดภาษาไทย

TIGRINYA

ትግርኛ እነገሩ

TURKISH

Türkçe konuşurum

U**UKRAINIAN**

Я розмовляю українською мовою

URDU

میں اردو بولتا ہوں

V**VIETNAMESE**

Tôi nói tiếng Việt

W**WELSH**

Dwi'n siarad

X**XHOSA**

Ndithetha isiXhosa

Y**YIDDISH**

איך רעד יידיש

YORUBA

Mo nso Yooba

Z**ZULU**

Ngiyasikhuluma isiZulu

Select ethnic languages of Burma/Myanmar

Ethnic Grouping	Linguistic Variant	Phrase in the Ethnic Languages
Kachin	Jingpho	Nga! jinghpaw ga shaga ai
	Uau	AW LI-SU AO: X 13, 10
	Rawang	Nga Rawang Ka Shzhe
Karen (Kayah)	Karen (Kayah)	ဗရပူင်ကွဲကွဲဟူပူပူ ဝပူဝ
Karen	S'gaw	ယကတိကညီနီ
	Eastern Pwo	ယိုခါယို
Chin	Tedim	Kel Tedim Pau pau ing
	Falam	Falam tong ka tong
	Hakha	Hakha holh ka thiam
	Zophe	Zypho rae ka cul
	Thantlang	Thantlang holh ka thiam
	Lautu	Lautu ကောလ်ပြည်သည်
	Matu	Matu owl ka cal
	Mindet	Mindet ကောလ်ပြည်သည်
	Kanpetlet	Kanpetlet ကောလ်ပြည်သည်
	Mizo	Mizo tong ka thiam
	Mara	Mara reih ai chei
	Zotung	Zo Bya Ka Thya
	Kumi	Kumi ကောလ်ပြည်သည်
Mon	Mon/Mun	သံသရာနီယံ
Bamar	Burmese	မြန်မာကောလ်ပြည်သည်
Arakan (Rakhine)	Rakhine/Arakan	ရခိုင်ကောလ်ပြည်သည်
	Rohingya	Rohingya ကောလ်ပြည်သည်
Shan	Palaung	Palaung ကောလ်ပြည်သည်
	Shan	Shan ကောလ်ပြည်သည်

Select indigenous languages of Mexico

Agrupación Lingüística	Variante Lingüística	Frases en español	Frases en lengua
chichimeco jonaz	chichimeco jonaz	yo hablo chichimeca	ikáuj úza' é-r-f
mazateco	mazateco del norte	yo hablo mazateco Hablo la lengua de Santa María Chilchotla	Cha' ña enná Cha' ña énn nda zo
maya	maya	Yo hablo maya	tsen k'in t'aan maya
mixe	mixe bajo	Yo hablo mixe	Madyakpiéch ayuuk
	mixe alto, de Tlahuiloipoc	Yo hablo mixe	Xaemkéxpét ayuuk éts nkejpyxy
mixteco	mixteco del oeste de la costa	yo hablo mixteco	Yuu kain se'en eavi ñu ñundua
náhuatl	náhuatl de la huasteca veracruzana (se entiende junto con Veracruz y San Luis Potosí)	yo hablo náhuatl	Na nítajtowa náhuatl
tojolabel	tojolabel	yo hablo tojolabel	Ja' ña' n' wala kúmeniyon tojol-abéi
triqui	triqui de la baja	yo hablo triqui	'unj a'mli xna' énj nu' a
tsotzil	tsotzil (variante unificada)	yo hablo tsotzil	Te jo'one ja k'op ts bata' k'op tsotzil
tsotzil	tsotzil (variante unificada)	yo hablo tsotzil	Wu'ne jna'xi k'op ts bata' k'op
zapoteco	zapoteco de la planicie costera	yo hablo zapoteco	Ñaa riné' diidzazá
chinanteco	chinanteco del sureste medio	yo hablo chinanteco	Jnae lo'n jujm' klee' daa mo' kuóo

APPENDIX G

Training Materials & Records of Training Attendance

To be provided in the 2026 Plan Update.

APPENDIX H

Reports & Outcomes of Data Collected

To be provided in the 2026 Plan Update.

APPENDIX I

Annual Goals & Accomplishments

Annual Goals & Accomplishments (2025)

Annual Accomplishments (October 2024 – September 2025)

Training:

- 100% of new hires received Title VI/ADA orientation.

Complaint Tracking:

- 0 Title VI complaints filed with the City of Goshen in 2025.

Public Involvement:

- Developed a public involvement survey to be available at all public meetings.

LEP & Accessibility:

- Maintained Spanish translations of vital documents (brochures, complaint forms, survey).
- No formal requests for interpreters received; partnerships with local nonprofits remain in place.

Environmental Justice (EJ):

- Completed EJ review for 1 federally funded project (transportation). No disproportionately high or adverse impacts identified.

Annual Goals (October 2025 – September 2026)

Training:

- Expand training format to include online modules for easier access.
- Achieve 100% staff completion of annual Title VI training.

Public Involvement & Outreach:

- Publish an online version of the developed survey.
- Provide paper copies in both Spanish and English at all public meetings.
- Provide announcements in both English and Spanish at all public meetings.

LEP Services:

- Translate at least 3 additional vital documents into Spanish.
- Develop quick-reference protocol for staff when serving LEP residents.

Accessibility:

- Conduct an internal review of City facilities for ADA/504 compliance in partnership with the Taskforce for Community Accessibility.

Data & Reporting:

- Begin publishing a summary report of Title VI data outcomes (complaints, surveys, LEP service usage) on the City website annually.

Exhibit #3

**GOSHEN BOARD OF PUBLIC WORKS AND SAFETY
RESOLUTION 2025-26**

**Adopting the 2025 City of Goshen
Title II - Americans with Disabilities Act Transition Plan**

WHEREAS the Americans with Disabilities Act (ADA) of 1990, as amended, requires that public entities adopt an ADA Transition Plan to ensure that programs, services, activities, and facilities are accessible to all individuals, including persons with disabilities; and

WHEREAS the City of Goshen is committed to providing equal access and opportunity to all individuals, including those with disabilities.

NOW, THEREFORE, BE IT RESOLVED by the Goshen Board of Public Works and Safety that the following 2025 City of Goshen Title II - Americans with Disabilities Act Transition Plan attached hereto and made a part hereof, is hereby approved.

BE IT FURTHER RESOLVED, that upon of approval of the 2025 City of Goshen Title II - Americans with Disabilities Act Transition Plan, Resolution 2012-J, Adopting the Americans with Disabilities Act Transition Plan for Pedestrian Facilities in the Public Right-of-Way, is hereby repealed.

PASSED and ADOPTED by the Goshen Board of Public Works and Safety on September 25, 2025.

Gina M. Leichty, Mayor

Mary Nichols, Member

Orv Myers, Member

Michael A. Landis, Member

Barb Swartley, Member

Exhibit #4

**GOSHEN BOARD OF PUBLIC WORKS AND SAFETY
RESOLUTION 2025-27**

Adopting the 2025 City of Goshen Title VI Implementation Plan

WHEREAS Title VI of the Civil Rights Act of 1964, along with other nondiscrimination authorities, prohibits discrimination based upon race, color, national origin, sex, age, disability, income status, and limited English proficiency in any program or activity of an entity that receives Federal financial assistance.

WHEREAS the City of Goshen shall comply with and uphold all federal laws and administrative guidelines prohibiting discrimination on the basis of race, color, national origin, sex, age, disability, income status, or limited English proficiency when carrying out all programs or activities.

WHEREAS as a recipient of Federal financial assistance, the City of Goshen is required to have a Title VI Implementation Plan to ensure continuous compliance with Title VI.

NOW, THEREFORE, BE IT RESOLVED by the Goshen Board of Public Works and Safety that the following 2025 City of Goshen Title VI Implementation Plan attached hereto and made a part hereof, is hereby approved.

PASSED and ADOPTED by the Goshen Board of Public Works and Safety on September 25, 2025.

Gina M. Leichty, Mayor

Mary Nichols, Member

Orv Myers, Member

Michael A. Landis, Member

Barb Swartley, Member

Exhibit #5

Yaw Construction Inc.

63246 County Road 111

Goshen, Indiana 46526

Cellphone # 574-320-6408

September 25, 2025

City of Goshen, Board of Works,

I am writing to request that the city blocks off two parking spaces each in front of the following businesses:

two parking spaces in front of 201 South Main Street, Goshen,

two parking spaces in front of 211 South Main Street, Goshen, and

two parking spaces in front of 213 South Main Street, Goshen.

This request is for Friday morning of September 26, 2025 by 10:00 am. This request is for completing construction of filling in basement vaults at the three locations previously specified. The required permits have been filed and approved.

Sincerely,

Kerry E. Yaw

Yaw Construction Inc.