

FTA Title VI Program

Submitted July 26, 2026



Reviewed and Approved by:

A handwritten signature in black ink, which appears to read "Scott Marler".

Scott C. Marler, Director
Iowa Department of Transportation

Date: August 26, 2026

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Section 1 Program Overview

Introduction

The Iowa Department of Transportation (Iowa DOT) is a recipient of federal financial assistance and complies with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964. Iowa DOT programs, policies, and activities operate without regard to race, color, or national origin. The Iowa DOT expects every manager, supervisor, employee, and subrecipient of federal funds administered by the Iowa DOT to be aware of and apply the intent of Title VI of the Civil Rights Act of 1964 in performing assigned duties in a nondiscriminatory manner. In the event the Iowa DOT distributes federal aid funds to a subrecipient, the Iowa DOT will include Title VI language in all written agreements. The Iowa DOT Title VI Program considers all elements required by the U.S. Department of Transportation regulations (49 CFR part 21), as outlined in Circular 4702.1B, and integrates the Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons (70 FR 74087).

The Iowa DOT's Title VI Program focuses on functional areas with significant public contact and provides the policy direction necessary to ensure nondiscriminatory service. The Title VI Program ensures that the level and quality of public transportation service is provided in a nondiscriminatory manner, including full and fair participation in public transportation decision-making, and meaningful access to transit-related programs and activities by persons with limited English proficiency. The Iowa DOT assures every effort is made so that no person shall be excluded from participation in, be denied benefits or subjected to discrimination under any program or activity receiving federal financial assistance.

The Iowa DOT Civil Rights Bureau (CRB) and Modal Transportation Bureau (MTB) reviews and updates the Iowa DOT Title VI Program every three years, or as needed, and presents the updated plan to the Iowa DOT management team for approval. The approved final draft will be submitted to the Federal Transit Administration (FTA).

Iowa DOT's CRB Director is responsible for initiating and monitoring Title VI activities, preparing report and performing other responsibilities, as required by 23 CFR part 200 and 49 CFR part 21. The Compliance and Training Specialist on the Public Transit Team of the Modal Transportation Bureau compiles this Title VI Program and has Title VI oversight responsibilities for Iowa's rural and small city (under 50,000 in population) public transit agencies.

The Iowa DOT Title VI Program has been sent to and approved by the Iowa DOT Director, Scott Marler. The signature and date of approval are located on the cover page of this document.

Section 2 General Requirements and Guidelines

Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA is accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. The Iowa DOT, transit systems and sub-providers may not discriminate in services provided, or in operations to provide those services. Iowa DOT has the responsibility to ensure that transit systems receiving federal funding comply with all civil rights requirements.

As the grantee for Section 5310, 5311, and statewide 5339 programs, the Iowa DOT is required to document that subrecipients comply with all the civil rights requirements in conducting their transit programs. Contracts contain assurance clauses that transit agencies sign to verify compliance, those clauses include by reference the FTA Title VI Circular.

Public Notice

The notice to the public that indicates the Iowa DOT complies with Title VI and informs the public of the protections against discrimination. This notice is widely distributed throughout DOT facilities across the state. This includes the administrative, district and program offices as well as rest areas. This document is located on the Iowa DOT website at:

<https://iowadot.gov/media/77/download?inline>

This notice is displayed in Attachment #1

Title VI Complaint Procedures

If any person believes that they or any other program beneficiary has been subjected to unequal treatment or discrimination in their receipt of benefits and/or services, on the grounds of race, color, or national origin, a Title VI discrimination complaint may be filed with the Iowa DOT. The Iowa DOT will investigate and create a file with the complaint, investigative plan, investigation report, findings, recommendations, and remedial action taken. There were no transit related Title VI complaints received by the Iowa DOT since the last submission of the Title VI Program.

The Title VI brochure discusses how to file a Title VI complaint. The link to the *Title VI and You* brochure is located at: <https://iowadot.gov/media/74/download?inline>

Transit agencies who are subrecipients (Iowa's 16 regional system and urban systems in areas under 50,000 in population) notify passengers and interested persons that they may file discrimination complaints directly with the transit system. Each transit system develops their own procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a

complaint available to the public. Transit agencies must also develop a Title VI complaint form. The form and the procedure for filing a Title VI complaint shall be available on the transit system's website. Subrecipient transit agencies may adopt the Title VI complaint investigation and tracking procedures, and complaint form developed by the Iowa DOT, although complaints and investigations must be made to and processed by the transit system.

All transit agencies must prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the transit system. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, actions taken by the transit agency in response, or final findings related to, the investigation, lawsuit, or complaint. The list is included in the Title VI Program submitted to FTA or Iowa DOT, depending on the size of the system, every three years. The list of Title VI complaints, investigations, and lawsuits in the last three years are included in the table below.

Title VI Complaints, Investigations, and Lawsuits

Investigations	Date	Summary	Status	Actions
none				
Complaints	Date	Summary	Status	Actions
1. SWIPCO	4/28/23	A former employee filed an EEO complaint. No allegation of discrimination based on a protected class was made and not a valid Title VI complaint.	Resolved	An attorney investigated the complaint and determined the allegation made in the complaint was unfounded.
Lawsuits	Date	Summary	Status	Actions
none				

Title VI Complaint Form

The Iowa DOT Title VI Non-Discrimination Complaint form is located at:

<https://iowadot.seamlessdocs.com/f/TitleVIComplaintForm>

The Spanish version of the Iowa DOT Title VI Non-Discrimination Complaint Form is located at:

<https://iowadot.seamlessdocs.com/f/TitleVIComplaintFormpaSpanish>

Public Participation Plan

The State Public Participation Process for Transportation Planning is composed of the following: Federal Requirements, State Transportation Plan, Iowa Five-Year Transportation Improvement Program and STIP, Project Development and Public Participation Support.

The public participation process was developed to provide Iowans an opportunity to help identify transportation issues, needs and priorities; plan how to meet those needs and priorities; and select transportation projects that turn the plan into reality. Information is widely distributed regarding opportunities for public input throughout the planning and programming process. Public comments and concerns are considered when transportation decisions are made.

The Iowa DOT works with many partners to involve the public in transportation planning. Iowa has nine metropolitan planning organizations (MPOs) and eighteen regional planning affiliations (RPA's) that take steps to inform and involve the public. The Iowa DOT coordinates state and local public participation activities where possible, to eliminate duplication of efforts, and to share ideas.

Limited English proficiency (LEP) concerns, including possible impacts to minority and low-income populations, are identified during the development process. Appropriate measures are taken to include these populations in the public involvement process. In addition, the Iowa DOT takes reasonable steps to ensure meaningful access to programs and activities by LEP persons.

The Iowa Public Transit 2050 Long Range Plan was finalized in May 2026. Public outreach initiatives took place during the process. The plan was developed using various methods and multiple sources to obtain feedback regarding public transportation needs in the state.

The first outreach opportunity to announce the update to the plan took place at the Annual Iowa Passenger Transportation Summit held at the Des Moines Area Community College (DMACC) Ankeny campus in 2024. Attendance was an open invite, allowing the members of the public to attend and participate alongside federal, state, and local government officials, public transit agency staff, and human service organizations.

For this summit, a survey was developed that summarized the results of the Iowa Public Transit Needs Survey that was distributed alongside the 2020 plan. This secondary survey gave all attendees a chance to provide their feedback on the previous results and share more details about any new public transit challenges they are experiencing.

An online public survey was open for input from October 16th, 2024, to February 1st, 2025. The intent of the survey was to provide the public an opportunity to weigh-in on their experiences of public transit and how it can be improved upon.

Iowa DOT's Outreach and Development Bureau created a website for the Plan, press releases, posts on the Iowa DOT's Transportation Matters blog, and posts on the department's social media accounts.

A 30-day public comment period was held for this plan from November 1st to December 1st, 2025. During this time, the draft plan was posted online along with contact information and a comment form. All responses and comments from the public surveys, website, social media, and public comment period were compiled and considered while revising the final draft of the Plan.

The Iowa DOT Iowa Public Transit 2050 Long Range Plan is located at:

<https://iowadot.gov/media/14184/download?inline>

The Public Participation Plan was last updated September of 2017

<https://iowadot.gov/media/862/download?inline>

The Iowa DOT Modal Transportation Bureau requires transit agencies to hold a public hearing for the Consolidated Transit Funding Application each year. The Consolidated Transit Funding Application is used by all transit agencies to apply for state, and in some cases federal transit funding. The notice to the public must describe the project(s) in sufficient detail to allow the public to be aware of the projects and funding sources. The public hearing should cover both operation and capital projects. Vehicles must be broken out by category and listed with other major capital items with separate estimates of cost. Comments from the public regarding the need for the project are recorded. A copy of the notice, affidavit of publication and proceeding/transcripts/minutes are included with the application submitted to the Iowa DOT.

All projects submitted in the Consolidated Transit Funding Application are required to be included in the annual transit element of the local Transportation Improvement Program (TIP). The funding requests in the application must match the amounts programmed in the TIP.

The following lists include when public hearings were held by each transit system for FY 2024 – FY 2026.

Consolidated Transit Funding Public Hearings FY 2024

Size	Transit System	Date
Small Urban	Burlington Urban Service (BUS)	4/17/2023
Small Urban	Clinton Municipal Transit Administration	4/25/2023
Small Urban	Dodger Area Rapid Transit (DART)	5/22/2023
Small Urban	City of Marshalltown	4/24/2023
Small Urban	Mason City Transit	5/2/2023
Small Urban	City of Muscatine	4/20/2023
Small Urban	Ottumwa Transit Authority	5/31/2023
Large Urban	Ames Transit Agency (CyRide)	5/13/2023
Large Urban	Bettendorf	5/2/2023
Large Urban	Cambus (University of Iowa)	5/16/2023
Large Urban	Cedar Rapids Transit	3/28/2023
Large Urban	Coralville	4/11/2023
Large Urban	Council Bluffs	5/8/2023
Large Urban	Davenport	5/10/2023
Large Urban	Des Moines Area Regional Transit (dart)	4/24/2023
Large Urban	Dubuque (The JULE)	6/5/2023
Large Urban	Iowa City	5/16/2023
Large Urban	Sioux City	4/19/2023
Large Urban	Waterloo (MET)	5/12/2023
Regional	1 Northeast Iowa Community Action Corp.	5/18/2023
Regional	2 North Iowa Area Council of Governments	5/30/2023
Regional	3 Regional Transit Authority (RIDES)	5/18/2023
Regional	4 Siouxland Regional Transit System (SRTS)	4/19/2023
Regional	5 Mid Iowa Development Association (MIDAS)	5/22/2023
Regional	6 Region Six Planning Commission	5/22/2023
Regional	7 Iowa Northland Regional Transit Commission	5/18/2023
Regional	8 Region 8 Regional Transit Authority	4/5/2023
Regional	9 River Bend Transit	4/19/2023
Regional	10 East Central Iowa Council of Governments	4/27/2023
Regional	11 Heart of Iowa Regional Transit System	4/27/2023
Regional	12 Region 12 Council of Government	5/11/2023
Regional	13 Southwest Iowa Transit Agency	4/27/2023
Regional	14 Southern Iowa Trolley	5/4/2023
Regional	15 10-15 Regional Transit System	5/31/2023
Regional	16 SEIBUS	5/25/2023

Consolidated Transit Funding Public Hearings FY 2025

Size	Transit System	Public Hearing Date
Small Urban	Burlington Urban Service (BUS)	4/15/2024
Small Urban	Clinton Municipal Transit Administration	4/23/2024
Small Urban	Dodger Area Rapid Transit (DART)	5/22/2024
Small Urban	City of Marshalltown	5/28/2024
Small Urban	Mason City Transit	5/7/2024
Small Urban	City of Muscatine	4/18/2024
Small Urban	Ottumwa Transit Authority	5/23/2024
Large Urban	Ames Transit Agency (CyRide)	6/17/2024
Large Urban	Bettendorf	5/7/2024
Large Urban	Cambus (University of Iowa)	6/6/2024
Large Urban	Cedar Rapids Transit	5/14/2024
Large Urban	Coralville	6/11/2024
Large Urban	Council Bluffs	5/6/2024
Large Urban	Davenport	5/22/2024
Large Urban	Des Moines Area Regional Transit (dart)	4/15/2024
Large Urban	Dubuque (The JULE)	6/17/2024
Large Urban	Iowa City	6/4/2024
Large Urban	Sioux City	5/15/2024
Large Urban	Waterloo (MET)	5/17/2024
Regional	1 Northeast Iowa Community Action Corp.	6/6/2024
Regional	2 North Iowa Area Council of Governments	7/12/2024
Regional	3 Regional Transit Authority (RIDES)	5/16/2024
Regional	4 Siouxland Regional Transit System (SRTS)	5/15/2024
Regional	5 Mid Iowa Development Association (MIDAS)	5/22/2024
Regional	6 Region Six Planning Commission	6/11/2024
Regional	7 Iowa Northland Regional Transit Commission	5/16/2024
Regional	8 Region 8 Regional Transit Authority	5/1/2024
Regional	9 River Bend Transit	5/15/2024
Regional	10 East Central Iowa Council of Governments	4/25/2024
Regional	11 Heart of Iowa Regional Transit System	6/20/2024
Regional	12 Region 12 Council of Government	4/11/2024
Regional	13 Southwest Iowa Transit Agency	4/25/2024
Regional	14 Southern Iowa Trolley	5/23/2024
Regional	15 10-15 Regional Transit System	5/23/2024
Regional	16 SEIBUS	5/23/2024

Consolidated Transit Funding Public Hearings FY 2026

Size	Transit System	Date
Small Urban	Burlington Urban Service (BUS)	4/21/2025
Small Urban	Clinton Municipal Transit Administration	4/8/2025
Small Urban	Dodger Area Rapid Transit (DART)	4/23/2025
Small Urban	City of Marshalltown	4/28/2025
Small Urban	Mason City Transit	4/15/2025
Small Urban	City of Muscatine	4/17/2025
Small Urban	Ottumwa Transit Authority	4/22/2025
Large Urban	Ames Transit Agency (CyRide)	4/28/2025
Large Urban	Bettendorf	4/15/2025
Large Urban	Cedar Rapids Transit	4/8/2025
Large Urban	Cambus (University of Iowa)	4/15/2025
Large Urban	Coralville	4/22/2025
Large Urban	Council Bluffs	4/21/2025
Large Urban	Davenport	4/23/2025
Large Urban	Des Moines Area Regional Transit (dart)	3/31/2025
Large Urban	Dubuque (The JULE)	5/19/2025
Large Urban	Iowa City	4/15/2025
Large Urban	Sioux City	4/23/2025
Large Urban	Waterloo (MET)	4/16/2025
Regional	1 Northeast Iowa Community Action Corp.	4/21/2025
Regional	2 North Iowa Area Council of Governments	4/28/2025
Regional	3 Regional Transit Authority (RIDES)	4/17/2025
Regional	4 Siouxland Regional Transit System (SRTS)	4/23/2025
Regional	5 Mid Iowa Development Association (MIDAS)	4/23/2025
Regional	6 Region Six Planning Commission	4/28/2025
Regional	7 Iowa Northland Regional Transit Commission	4/17/2025
Regional	8 Region 8 Regional Transit Authority	4/2/2025
Regional	9 River Bend Transit	4/16/2025
Regional	10 East Central Iowa Council of Governments	4/24/2025
Regional	11 Heart of Iowa Regional Transit System	4/24/2025
Regional	12 Region 12 Council of Government	4/10/2025
Regional	13 Southwest Iowa Transit Agency	4/24/2025
Regional	14 Southern Iowa Trolley	4/24/2025
Regional	15 10-15 Regional Transit System	4/22/2025
Regional	16 SEIBUS	3/27/2025

The individual TIPs are aggregated by Iowa DOT into the Statewide Transportation Improvement Program (STIP). The Iowa DOT has implemented public involvement procedures specific to the STIP. After compiling information contained in the Iowa DOT's TIP, MPO and RPA TIP's, an electronic copy of the draft STIP was available for public review through placement on the Iowa DOT's website. Additionally, an Iowa DOT news release was distributed notifying all of the STIP availability. A virtual

public input meeting was held on August 20, 2025, to take comments concerning the draft STIP from a statewide perspective. The virtual meeting to accept public comments for the 2025-2028 STIP was held August 21, 2024, and the virtual meeting to accept public comments for the 2024-2027 STIP was held on August 24, 2023.

Language Assistance LEP Four-Factor Analysis & Plan

The Iowa DOT provides meaningful access for LEP individuals by identifying and engaging limited English proficient (LEP) populations to ensure their involvement and knowledge of transportation planning and projects in and around their communities. An LEP person is defined as one who does not speak English as his or her primary language and has a limited ability to read, write or understand English. The Iowa DOT policy for engaging individuals with LEP is to provide interpretation/translation services to individuals who request them, if reasonable accommodations can be made. In addition, the Iowa DOT proactively identifies communities with high concentrations of LEP persons and employs tactics and strategies to effectively engage them in the planning process. The Iowa DOT trains staff to recognize individuals in community meetings and forums who may show difficulty or inability to read or write English and to assist them accordingly.

The Iowa DOT Language Assistance LEP Four Factor Analysis & Plan can be found at:
<https://iowadot.gov/media/43/download?inline>

Committee and Council Selections

The Public Transit Advisory Council (PTAC) represents Iowa public transit agencies regarding all State of Iowa public transit funding and policy issues. Council membership includes public transit professionals from regional, small urban (20,000 to 49,999 population), large urban (50,000 to 199,999 population), and urban transit systems (200,000+ population). PTAC members are appointed by the Iowa Department of Transportation’s Public Transit Director and serve a term of three years and a total of no more than four terms. Vacancies are filled by the Iowa DOT’s Public Transit Director, with the recommendations from the PTAC’s members. When a term is up, race will be one of the considerations when appointing a member from those nominated. The following chart represents the current PTAC membership:

PTAC Membership Table of Racial Breakdown

Agency Category	Race
Regional	African American
Regional	Caucasian
Small Urban	Caucasian
Large Urban (50,000 – 199,999)	Caucasian
Large Urban (200,000)	Caucasian

The Iowa Transportation Coordinated Council (ITCC) was created in 1992 with original members including the Iowa Department of Transportation, the Iowa Department of Human Services, and the Iowa Department of Elder Affairs. In 2001, the ITCC membership was expanded. A United We Ride Action Plan for Iowa was created in 2005.

Chaired by the Iowa Department of Transportation's Public Transit team, the ITCC meets bi-monthly discussing such issues as mobility management, accessibility of transportation in Iowa, State Transit Assistance Special Project Proposal applications pertaining to coordination, and the encouragement of state and local agencies' involvement in the passenger transportation planning process.

Having grown considerably from the three original member state departments, the ITCC now includes membership from statewide organizations, state departments, and federal groups. ITCC is a non-voting committee, and the member agencies select their own representative to serve on the ITCC.

Subrecipient Title VI Compliance

The Iowa DOT MTB takes on the responsibility to conduct Title VI reviews of its subrecipients of federal financial assistance, namely Iowa's small urban and regional public transit agencies, regional planning affiliations (RPA) and metropolitan planning organizations (MPO). Updates to agency Title VI Programs are due to the MTB triennially. The subrecipient Title VI Programs were last updated and collected by the Iowa DOT in 2023 and are being updated by the transit agencies in 2026. Those public transit agencies serving urban populations over 50,000 work with the FTA directly on Title VI compliance.

The MTB and CRB created Title VI Program templates based on FTA circular 4702.1B for Iowa's public transit systems and planning agencies to follow in creating their respective Title VI Programs. An example copy of the Title VI Program Template is included in this document's Attachment # 3. The MTB Compliance and Training Specialist completes the following as part of a Title VI review process:

1. Review Title VI Programs for compliance with FTA circular 4702.1B. The Programs are stored electronically on the internal Iowa DOT share drive.
2. View public transit vehicles and public transit facilities during compliance reviews to ensure proper postings of Title VI Notice to the Public.
3. Review public transit websites for posting of Title VI compliant process.

The MTB performs compliance reviews including the Title VI topic every three years on regional and small urban public transit systems. The MTB completes a compliance review report on each transit system reviewed. The MTB retains that report for three years, providing a copy to FTA upon request. An example copy of the Compliance Review Questionnaire is included in this document's Attachment #2.

The Iowa DOT seeks the cooperation of the subrecipient to correct deficiencies found during the review. The Iowa DOT provides the technical assistance and guidance needed to aid the subrecipient to comply voluntarily. If necessary, the Iowa DOT MTB will withhold public transit funding until compliance is achieved. The MTB determines if additional monitoring is needed to obtain a compliant status and ensure ongoing compliance with Title VI requirements. MTB seeks guidance and provide updates, as warranted to CRB.

The CRB reviews RPAs each year as part of the review process established by the Systems Planning Bureau and shall follow the schedule and selection of RPAs established by said office. MTB staff participate in those reviews, and FHWA and FTA related Title VI questions are asked.

A compliance review report or letter is issued within 30 days following the onsite review. A copy of the report or letter is provided to the subrecipient. Commendations and recommendations for improvement are noted in the report or letter. The public transit agencies are expected to report corrections within three months. The RPA's progress is checked at three years, and another full review occurs at six years.

Constructed Facilities Equity Analysis

The Iowa DOT as a recipient of FTA funds, does not own or operate any public transit facilities. The Iowa DOT has not constructed any new facilities during this period. The Title VI Program template the Iowa DOT provides to transit systems and agencies to use, includes a section to indicate construction of a new facility using FTA funds. The template requests an attached copy of the Title VI equity analysis conducted during the planning stage regarding the location of the facility. There are currently seven subrecipient facility projects in progress. Four of the facilities have completed the planning stage and have provided their Title VI equity analysis. Documents are saved electronically on the internal Iowa DOT share drive.

- 301 Industrial Parkway, Creston, Iowa
- 7440 Vine Street Ct., Davenport, Iowa
- 1635 NW Vicksburg Ct., Waukee, Iowa
- 217th Road & T Avenue, Boone, Iowa

Section 3 Requirements for States

Transit services in Iowa are provided by 35 designated urban and regional public transit systems. The MTB administers federal and state transit funding programs and provides technical assistance to these public transit systems.

Title VI responsibilities are focused on monitoring the operations of the urban or regional transit systems, because Iowa DOT does not directly operate any transit systems. Iowa DOT is not a provider of fixed route public transportation. It should be noted that urban transit systems serving areas with

populations greater than 50,000 engage directly with and are monitored by the FTA, although the MTB provides guidance.

Demographic Maps of Minority and Non-minority Populations

According to the 2020 U.S. Census, Iowa's total population was 3,190,369 which is an increase of 4.7% from 2010.

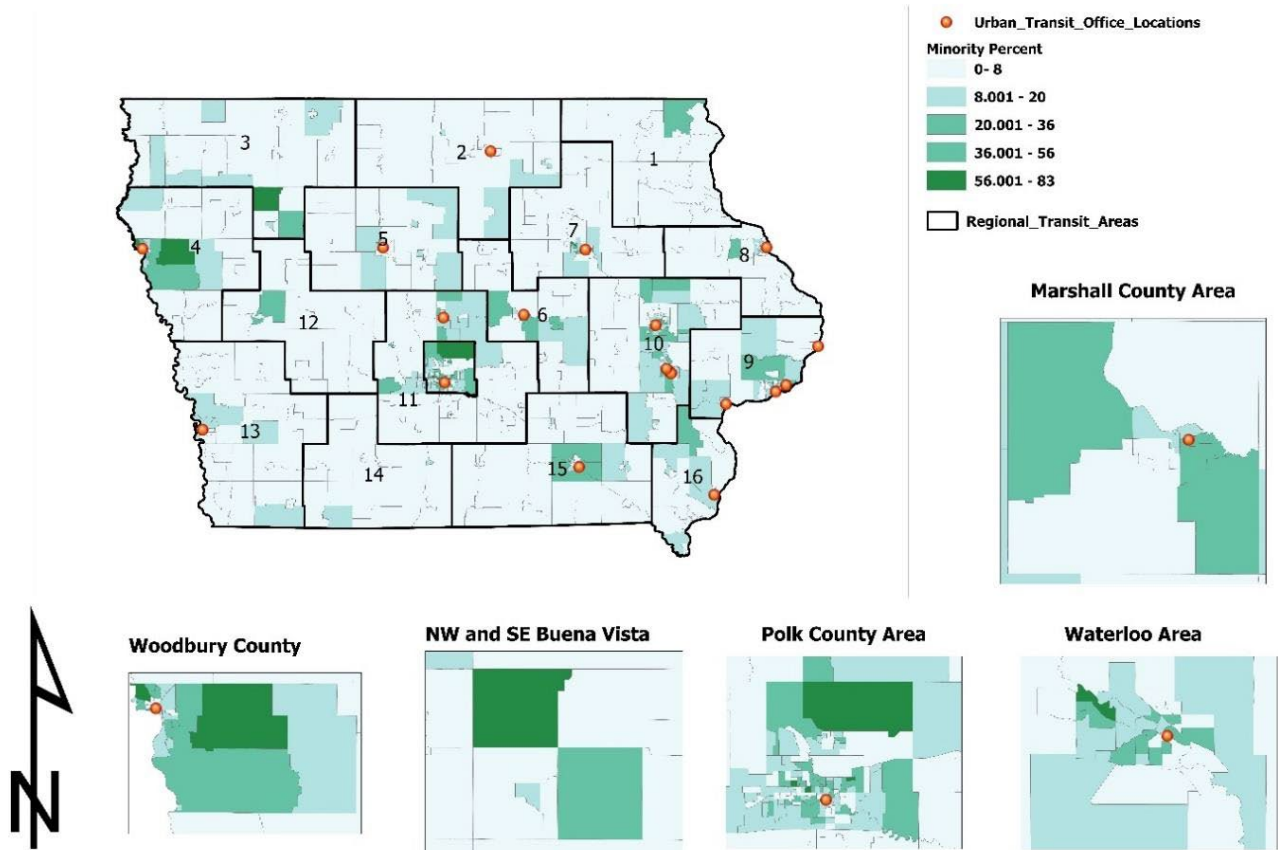
2020 U.S. Census, Iowa Statewide

Race	Percentage
White Alone	84.5
Black or African American Alone	4.1
American Indian and Alaskan Native Alone	0.5
Asian Alone	2.4
Native Hawaiian and Other Pacific Islander Alone	0.2
Some Other Race Alone	2.8
Two or More Races	5.6

In 2020, the percentage of Iowa's population that was Hispanic or Latino was 6.8%

The Percentage of Minority in Iowa by Census Tract Map shows the 2020 U.S. Census percentage of minorities in Iowa by Census tract with the public transit agency locations or boundaries depicted.

Percentage of Minority in Iowa By Census Tract



Iowa's recipients of federal and state public transit assistance are entities, cities, multi-county regions set up as units of government, or non-profit agencies serving a multi-county area. Only one recipient may be designated to serve any given area of the state. Allocation of federal and state operating dollars is done by formula based on ridership counts and miles traveled. Federal capital vehicle replacement funds are distributed on a points ranking process by vehicle age and mileage. No demographic data, minority or otherwise, is taken into consideration in the distribution. Therefore, it is done in a non-discriminatory manner.

Program Administration

The Iowa DOT is a primary recipient of federal transportation funds. As a regulatory requirement of receiving these funds, Iowa DOT is required to administer a program that establishes Title VI goals and objectives which pertain to highway and transportation programs. Iowa DOT remains responsible for administering Federal Transit Administration (FTA) financial assistance in the following programs:

- *Section 5305: Metropolitan and Statewide Planning Programs*
- *Section 5310: Transportation for Elderly Persons and Persons with Disabilities*
- *Section 5311(b)(3): Rural Transit Assistance Program (RTAP)*
- *Section 5339: Bus and Bus Facilities*

The Program Management Bureau (PMB) along with other Iowa DOT offices, the districts, and various state and local agencies, prepares the Iowa Transportation Improvement Program (Five-Year Program) and the Statewide Transportation Improvement Program (STIP). The PMB takes the lead in managing program funds to meet fiscal considerations. The distribution of funds is critical to ensuring an opportunity for all to receive benefits of federal transportation dollars.

The PMB takes positive steps to encourage full and fair participation by all affected groups in the development of the Five-Year Program and STIP. They also ensure that the project selection and programming process results in programs that provide opportunities for minority, low-income, disabled, and elderly populations to receive benefits.

Statewide Planning Process

The Systems Planning Bureau (SPB) leads statewide planning for the Iowa DOT and administers the project selection of special grant programs such as Iowa's Clean Air Attainment Program; Revitalize Iowa's Sound Economy; Statewide Transportation Alternatives Program; and State and Federal Recreation Trails. SPB prepares both long- and short-range system plans through cooperation with other Iowa DOT offices, the districts, various state and local agencies, Metropolitan Planning Organization, and Regional Planning Affiliations. These plans provide the framework for the Five-Year Program and STIP.

Title VI must be considered throughout the planning process to ensure adequate public involvement. Positive steps are taken to include minority, elderly, disabled and low-income residents. Steps are taken during the project selection process to avoid, minimize or mitigate disproportionately high adverse impacts from the individual projects. This is completed by considering both positive and negative effects of various transportation system alternatives on impacted groups. Potential impacts to the human environment are also identified and address in the planning process.

Grant agreements are reviewed to ensure nondiscrimination language is included. Grant selection criteria are also reviewed for inconsistencies.

An annual meeting is held with the Iowa DOT Systems Planning Bureau, Federal Highway Administration (FHWA), and FTA to review the Iowa DOT's Metropolitan Planning Organization (MPO)/ Regional Planning Affiliation (RPA) oversight and the Iowa DOT's planning activities. After the meeting, the FHWA and FTA release a report with the findings. The report includes this statement:

The Iowa DOT Office of Systems Planning, on a triennial basis, also reviews all 18 RPAs and 6 of the 9 MPOs (those urban areas under 200,000) for compliance on a number of issues, including Title VI.

Iowa's minority population, along with several other critical demographic considerations, is evaluated as part of the state transportation planning process, and specifically through the update of the state

long-range transportation plan. While Iowa's current transportation plan is more of a policy-level document, it is still important to consider the needs of minority populations at this level of planning.

For example, most minority groups in Iowa have a lower median household income than non-minorities. These populations are often more inclined to use a mode of transportation other than a personal automobile. As Iowa's minority population increases, so will the need to accommodate persons with limited English proficiency. These needs must be considered well before a specific project or program is implemented.

The Iowa Public Transit Long Range Plan considers the state's public transit needs into the year 2050. This plan was updated in 2026 to stay current with the contemporary operating environment, emerging trends, legislation, funding and technological developments. The Iowa DOT is working with transit agencies and stakeholders to develop and implement this Public Transit Long Range Plan to make the best use of limited resources to support a strong statewide transit system. This analysis can be utilized by the local public transit agencies to improve services to the community by determining where to provide new services, or where to alter current services. The plan is found at:

<https://iowadot.gov/iowainmotion/Modal-Plans/Public-Transit-Plan>

Statewide discussion of needs happens every few months through the Iowa Transportation Coordination Council, with representation from various state agencies (Iowa Department on Aging, Bureau of Refugee Services, and the Iowa Department of Public Health to name a few) and statewide coverage organizations such as the AARP and the Epilepsy Foundation Iowa to discuss passenger transportation needs of their constituents.

At the project-level, transportation needs are often identified through the public input process. This process is local with the individual transit agencies conducting public hearings on their annual funding applications each spring and with the regional metropolitan planning agencies facilitating Transit Advisory Group (TAG) meetings. In these meetings, human services agencies, transportation providers and other interested parties come together to discuss the needs of transportation-dependent populations. A minimum of two meetings of the TAG must occur each year.

FTA Financial Assistance to Subrecipients in a Non-discriminatory Manner

The Iowa DOT MTB may only distribute state and federal public transit assistance to public transit systems that have been duly designated as a single administrative agency (transit system). Chapter 324A of the Iowa Code defines transit systems and mandates that transportation services be coordinated.

Within each urban area or region, local officials must designate a single agency to be responsible for the administration and provision of transit services to the general public. The only entities that may receive public transit assistance administered by the MTB are these designated urban and regional

transit systems. In no instance shall an individual county be funded directly. A city must have a population of at least 20,000 or be part of an urbanized area before it can be designated as a transit system and funded directly. Any county may elect to designate the local urban transit system as its single administrative agency and may then become eligible to share the state or federal assistance received by that urban transit program.

At least one public transit system is designated to serve every area of the state. Agencies other than a designated transit system may receive state or federal transit assistance funding only via a pass-through agreement with a designated system.

As explained above, Iowa's recipients of federal and state public transit assistance are entities, cities, multi-county regions set up as units of government, or non-profit agencies serving a multi-county area. Only one recipient may be designated to serve any given area of the state. With the rare exception of a county switching from one region to another, these public transit agencies have been designated public transit agencies is done by formula based on ridership counts and miles traveled. No demographic data, minority or otherwise, is taken into consideration in the distribution. Therefore, it is done in a non-discriminatory manner.

FTA sections 5310 and 5311 funds are distributed to the small urban and rural transit agencies using a formula. The Iowa DOT formula allocating 5310 and 5311 funds uses the past year's performance measures. The quantity of formula funds to be distributed to small urban systems versus regional systems is determined by comparing the "net public deficit" (unrestricted tax support) for all urban systems, to that for all regional systems. The individual allocations to small urban systems are then determined based on 50 percent of the percentage of total small urban ridership accomplished by that system and 50 percent of the percentage of total small urban revenue miles provided by the individual system. Individual allocations for regional systems are based on 40 percent of the system's percentage contribution to total regional transit ridership and 60 percent on the system's percentage contribution to total regional revenue miles.

All section 5310 projects must derive from the area's Passenger Transportation Plan (PTP), developed through collaboration of public transit and human service interests.

Required match funds [50% of net costs for operating projects and 20% for capital (15% for ADA vehicles)] may come from any non-DOT federal funds; from state or local government; or from private sources.

The Iowa DOT does not have a competitive selection process for FTA grant applications. Distribution is based on the formula mentioned above and distributed to transit agencies. The Iowa DOT tells the transit agencies the funding available to them. The Iowa DOT has not accepted any funding requests directly from private non-profit organizations, State or local governmental authorities or Indian tribes.

Agencies other than a designated transit system may receive state or federal transit assistance funding only via a pass-through agreement with a designated system.

Assistance to Potential Subrecipients Applying for Funding That Would Serve Predominantly Minority Population

As stated above, only the designated urban and regional transit systems established under Chapter 324A of the Code of Iowa are eligible to receive the state and federal transit assistance funds administered by the Iowa DOT. Agencies other than the designated single administrative agency may benefit from state and federal transit assistance funding using purchase of services contracts from the designated agency, or to provide service under the auspices of that agency, depending on local policies. Any such sub-contracts must assure that services will be open to the general public and provide for a coordination of the transit services with other transit services either provided directly by the designated agency or by other sub-contractors. Potential sub-contractors contacting the Iowa DOT with interest in service provision are referred to the relevant designated public transit agency to discuss sub-contracting opportunities. Those sub-contracting agencies may contact the Iowa DOT MTB for advice or guidance on transit matters at any time.

2024-2026 Allocation of Operating and Capital Funding

The following tables show the operating and capital dollars, respectively, allocated to Iowa's public transit agencies over the last three years.

Operating Allocations

Transit System	Total State + Federal, Fiscal Year 2023-2025
Burlington Urban Service (BUS)	\$3,054,321.00
Clinton Municipal Transit Administration	\$3,990,240.58
Dodger Area Rapid Transit (DART)	\$3,381,305.47
City of Marshalltown	\$2,138,049.73
Mason City Transit	\$3,955,316.20
City of Muscatine	\$2,598,904.27
Ottumwa Transit Authority	\$2,520,944.00
Ames Transit Agency (CyRide)	\$17,602,560.00
Bettendorf	\$3,032,676.62
Cedar Rapids Transit	\$14,269,553.00
Cambus (University of Iowa)	\$6,997,829.00
Coralville	\$3,493,930.00
Council Bluffs	\$1,183,586.31
Davenport	\$9,167,058.00
Des Moines Area Regional Transit (dart)	\$24,673,385.60
Dubuque (The JULE)	\$10,600,381.07
Iowa City	\$11,673,568.00
Sioux City	\$8,765,881.18
Waterloo (MET)	\$8,450,228.42
1 Northeast Iowa Community Action Corp.	\$4,705,026.25
2 North Iowa Area Council of Governments	\$4,880,737.21
3 Regional Transit Authority (RIDES)	\$4,982,716.46
4 Siouxland Regional Transit System (SRTS)	\$4,338,182.83
5 Mid Iowa Development Association (MIDAS)	\$3,358,778.99
6 Region Six Planning Commission	\$1,651,484.90
7 Iowa Northland Regional Transit Commission	\$2,448,114.88
8 Region 8 Regional Transit Authority	\$4,268,338.49
9 River Bend Transit	\$3,280,563.46
10 East Central Iowa Council of Governments	\$11,114,606.00
11 Heart of Iowa Regional Transit System	\$5,369,043.29
12 Region 12 Council of Government	\$4,909,126.71
13 Southwest Iowa Transit Agency	\$9,396,211.63
14 Southern Iowa Trolley	\$2,921,705.00
15 10-15 Regional Transit System	\$8,570,232.00
16 SEIBUS	\$3,391,062.29

Capital Allocations Total

Transit System	Total State + Federal, Fiscal Years 2023-2025
Burlington Urban Service (BUS)	\$342,337.00
Clinton Municipal Transit Administration	\$246,904.00
Dodger Area Rapid Transit (DART)	-
City of Marshalltown	-
Mason City Transit	\$47,915.00
City of Muscatine	\$884,752.00
Ottumwa Transit Authority	\$126,395.00
Ames Transit Agency (CyRide)	\$106,287.00
Bettendorf	\$749,520.00
Cambus (University of Iowa)	\$229,675.00
Cedar Rapids Transit	-
Coralville	-
Council Bluffs	-
Davenport	\$77,946.00
Des Moines Area Regional Transit (dart)	\$1,538,002.00
Dubuque (The JULE)	\$1,905,240.01
Iowa City	\$177,523.00
Sioux City	\$661,353.00
Waterloo (MET)	\$768,060.00
1 Northeast Iowa Community Action Corp.	\$1,215,798.00
2 North Iowa Area Council of Governments	\$484,178.00
3 Regional Transit Authority (RIDES)	-
4 Siouxland Regional Transit System (SRTS)	\$858,224.00
5 Mid Iowa Development Association (MIDAS)	\$158,640.00
6 Region Six Planning Commission	\$306,135.00
7 Iowa Northland Regional Transit Commission	\$121,416.00
8 Region 8 Regional Transit Authority	\$678,356.00
9 River Bend Transit	\$388,859.00
10 East Central Iowa Council of Governments	\$1,636,103.00
11 Heart of Iowa Regional Transit System	\$586,636.00
12 Region 12 Council of Government	\$683,075.00
13 Southwest Iowa Transit Agency	\$883,215.00
14 Southern Iowa Trolley	\$778,354.00
15 10-15 Regional Transit System	\$494,495.00
16 SEIBUS	\$760,215.00

For the regional and small urban (under 50,000 in population) transit agencies, the Iowa DOT distributes FTA Sections 5310 and 5311 funding. For the large urban transit agencies with populations between 50,000 and 199,999, Iowa DOT distributes FTA Section 5310 funding. Transit agencies over 200,000 in population receive their FTA dollars directly from the FTA. The State of Iowa also provides a state funding source, State Transit Assistance (STA), funding which the Iowa DOT distributes to all Iowa public transit agencies. The 5310, 5311, and STA dollars are all allocated by funding formula using ridership, mileage, and in the case of STA, locally determined income factors. Total population and population diversity are not factored into the distribution of the operating dollars.

Iowa DOT is the recipient of FTA Section 5339 capital funding. Additionally, the Iowa Transportation Commission allocates \$3 Million annually in Carbon Reduction Program (CRP) funds to replace public transit vehicles in the state. To determine the vehicles eligible to be replaced with the Section 5339 CRP dollars, the Iowa DOT uses a points accrual system known as the Public Transit Management System (PTMS) based on age and mileage of the vehicle to ensure older vehicles are replaced first. No population or diversity factors are used in replacement of vehicles, only vehicle age and mileage. The PTMS process is described more fully at <https://iowadot.gov/media/2130/download?inline>. There may be periods of time where a public transit agency does not receive any capital funding from the Iowa DOT due to the transit agency's vehicles not having enough points for replacement or the local public transit agency not programming their vehicles for replacement in their Transportation Improvement Program (TIP). A vehicle must be in the local TIP and State TIP to receive replacement funds.

As shown on the tables on the previous pages, each of Iowa's transit agencies, covering all 99 counties of the state, received operating dollars from the Iowa DOT in the last three years.

Those areas over 200,000 not receiving capital dollars from Iowa DOT were Council Bluffs, Davenport, Coralville, and Cedar Rapids Transit. Each receives their own 5339 allocations for bus replacement and their buses likely were not high enough on the PTMS list to receive the statewide CRP funds in that time.

Marshalltown, Dodger Area Rapid Transit, and Region 3 Regional Transit Authority (RIDES) also did not receive capital funding from the state in the last three years. Again, these would either be due to the age/mileage on their vehicles not placing them at the top of the PTMS list or the local transit agencies not programming their vehicles in the TIP for replacement. This could be due to the transit agency not having enough local match available for the replacement vehicles or the vehicles they do have being in good operating condition able to last another few years. One of the transit agencies not receiving capital dollars in this three-year period – Marshalltown – does serve a higher minority area, as called out on the map on page 14. However, the regional transit agency, Region 6 or PeopleRides, serving Marshall County where Marshalltown is located did receive capital funding for bus replacement in the last three years.

Section 4 Attachments

Attachment 1: Iowa DOT Title VI and Nondiscrimination Notice to the Public

Title VI and Nondiscrimination Notice to the Public

The Iowa Department of Transportation hereby gives public notice that it is the policy of the Department to assure full compliance with Title VI of the Civil Rights Act of 1964 and related Nondiscrimination authorities. Title VI and related Nondiscrimination authorities provide that no person in the United States of America shall on the grounds of race, color, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. The Civil Rights Restoration Act of 1987 amended Title VI to specify that entire institutions receiving federal funds, whether schools, colleges, government entities, or private employers, must comply with Federal civil rights laws, rather than just the particular programs or activities that receive federal funds.

Any person who desires more information regarding Iowa DOT's Title VI Program can contact its Civil Rights/Title VI Program Coordinator – Nikita Rainey -- at the address noted below.

Any person who believes that they are being denied participation in a project, being denied benefits of a program, or otherwise being discriminated against because of race, color, national origin, sex, age, or disability, may contact:

Civil Rights Bureau/Director Iowa
Department of Transportation
800 Lincoln Way
Ames, Iowa 50010
800-262-0003 or 515-239-1304
Civil.Rights@iowadot.us

YOU SHOULD CONTACT THE ABOVE INDIVIDUAL OR IOWA DOT OFFICE AS SOON AS POSSIBLE BUT NO LATER THAN 180 DAYS AFTER THE ALLEGED DISCRIMINATION OCCURRED, OR IF THERE HAS BEEN A CONTINUING COURSE OF CONDUCT, NO LATER THAN 180 DAYS AFTER THE ALLEGED DISCRIMINATION WAS DISCONTINUED. CONTACT THE CIVIL RIGHTS COORDINATOR TO GET MORE INFORMATION ON THE IOWA DOT'S TITLE VI PROGRAM.

*This notice is widely distributed throughout DOT facilities across the State.
This includes the administrative, district and program offices as well as rest areas.*

Attachment 2: Compliance Review Questionnaire



**Compliance Review
for
Iowa 5310/5311 Subrecipient**

Transit System:

Reviewer:

Date:

Table of Contents

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Section 9: Subcontractor Compliance

Introduction

1. Description of Agency including:

- Organizational structure
- Hours of operation
- Number of full and part time employees and if they are administrative, maintenance, drivers, volunteers, etc.

2. Description of All Services including:

- Directly provided services
- Services under contract
- Services where a vehicle has a vehicle user agreement with another agency
- Please be as descriptive as possible, including days and hours of operation, passenger fare, which agency provides the drivers, does the service have a history of providing incidental services. Please list each service separately.

3. Highlight New Projects

Please take this opportunity to tell Iowa DOT about any new and existing projects the transit system has been working on, success stories or failures:

4. Documents to Provide Prior to Visit

Please email the following documents and the completed questionnaire to Jamie.wingert@iowadot.us one week prior to the scheduled visit. I will do a desk review of all the documents, and we will discuss them during the compliance review.

- An Excel spreadsheet with CY2025 Random Drug & Alcohol testing data showing dates and times of testing, and whether the tests were for drug, alcohol or both. Do not submit driver names or test results.
- Title VI Program, Notice to the Public, and Title VI Complaint Form
- Language Assistance Plan or LEP Plan
- Written Policy to describe process to solicit and consider public comment for fare increase or major service reduction
- Copy of the Public Participation Plan
- General ADA complaint procedure and complaint form
- ADA Reasonable Modification procedure and complaint form
- Suspension Policy for No-Shows, if applicable

- Drug & Alcohol Testing Policy
- Code of Ethics or Standards of Conduct for FTA procurement
- Transit Procurement Policies and Procedures
- Written Protest Procedure
- Vehicle Maintenance Plan
- Facility Maintenance Plan

5. Items Needed During Onsite Visit

- Requested Vehicle PM Records
- Requested Facility Maintenance Documentation
- Displayed EEO Posters
- Review CCFs
- Reasonable Suspicion Determination Form
- Drug & Alcohol record request form for new hires previous DOT covered employer
- Certificates of service agents for the MRO, SAP, BAT and collectors
- Procurement documents available for review
- Driver Log, if requested
- Rider's Handbook, if you have one
- Copy of brochure and map, if you have one
- Subcontractor Compliance Documentation, if applicable
- Please make the following vehicles available during the compliance review to check for required on-board safety equipment, Title VI Notice, and signage check for vehicle numbers: insert bus #s

Section 1: Eligibility

Eligibility Questions	Response
1. Are all transit services provided by the agency open to the general public? Describe any services not open to the public.	
2. Describe the way the transit system communicates to the public about how to use their services.	
3. Does the agency own all vehicles used to provide public transportation services? If not, who owns the vehicles?	
4. Do you have any vehicles that do not comply with current signage policy?	
5. Do any vehicle markings indicate specific client orientation? If so, provide the vehicle number and a photo of the markings.	
6. What greeting is used to answer phones for each service?	
7. Describe any incidental services the agency provides such as charters or meal delivery services. Are these incidental services provided with federally funded vehicles?	
8. How does the agency track the use of FTA-funded vehicles for incidental services to ensure usage does not exceed 20% on any vehicle?	

Eligibility Questions	Response
9. Has the agency gone through the process on FTA's Charter Registration website to publish a notice of intent that identifies willing and able private charter operators or does the agency limit charters to those agencies that are exceptions to the charter rule?	
10. Does the transit system provide school bus service? If so, please describe the how this service is provided. Is it exclusive, tripper, contract with a school system or demand response?	
11. How does the system notify the public of their rights under Title VI? Where is the Title VI Notice posted? Where can the public access the Title VI complaint form?	
12. Have any civil rights, Title VI complaints or lawsuits been filed against the transit agency or any of its subproviders? If so, what is the nature of the complaint/lawsuit and the status of resolving them. Were they reported to the Iowa DOT Public Transit Team?	

Eligibility Questions	Response
13.Does the transit agency have any buildings located in an area identified as having special flood hazards (100 year flood zone) and in which the sale of flood insurance has been made available under the National Flood Insurance Act of 1968? What is the date it was last checked? Was flood insurance purchased?	
14.What is the agency’s plan to develop its website and documentation therein to meet the requirements of Section 508 of the Rehabilitation Act?	
15.Fixed routes- Please detail the transit system’s system-wide service standards. Do the standards include measure for vehicle load, vehicle headway, on-time performance and service availability? What is the transit system’s policy on distribution of transit amenities in the community and vehicle assignments?	

Section 2: Management

Management Questions	Response
1. Does the agency have any equipment valued at over \$50,000? Has this been submitted to the Public Transit Team (PTT) for inclusion in the statewide Transit Asset Management (TAM) inventory?	

Management Questions	Response
2. Are all vehicles supporting the agency's public transit program included in the DOT BlackCat inventory? (Service vehicles, snowplows, maintenance trucks, buses purchased with local funds, etc.)	
3. How many spare vehicles does the agency have?	
4. Fixed routes- How many revenue vehicles are operated in maximum fixed route service?	
5. Does the agency have a contingency bus fleet? Is the contingency fleet plan up to date? Has this plan been submitted to the Iowa DOT?	
6. If the agency is not a unit of state or local government, does the agency follow the Federal Motor Carrier Safety Regulations?	
7. Does the agency transport individuals across state lines with a commercial motor vehicle with a capacity of eight passengers or more (including the driver)?	
8. If yes to question 7, is the agency required to register as a motor carrier with the USDOT? Do the registered vehicles display the assigned USDOT numbers?	
9. How long after contract closeout are related documents, original driver manifests, and statistics kept?	

Management Questions	Response
10. How does the transit agency calculate deadhead miles?	

Section 3: Planning and Public Participation

Planning and Public Participation Questions	Response
1. How does the transit agency participate in the Regional Planning Affiliation (RPA) planning process? Does the transit agency give input into the Long-Range Transportation Plan and the Transportation Planning Work Program?	
2. Is the transit agency a voting member of the MPO and/or RPA policy committee and technical committee?	
3. Does the transit agency participate in the region's Transit Advisory Group (TAG)?	
4. In the last three years, has the agency raised a fare or reduced service? Was the reduction considered "major"? Was the public comment process followed? If not, why?	
5. Provide examples of how the transit system ensures inclusive public participation of minority and LEP populations into its public participation procedures?	

Planning and Public Participation Questions	Response
6. Has the transit agency constructed or replaced any concrete pads or bus stop shelters over the past 3 years? Was FTA funding used for this construction? Please provide the address or location for each one. Were ADA considerations and the NEPA process followed?	
7. Has the transit agency constructed or rehabilitated a facility using federal funds? When was the last time the transit agency submitted a Real Property Inventory Report to the Iowa DOT?	

Section 4: Financial

Financial Questions	Response
1. Does the agency's accounting system track all revenues and expenses attributable to the public transit program? How are these revenues and expenses clearly identified as being related to the public transit program?	
2. Does the agency have financial policies and procedures in place for managing federal awards, establishing internal controls, ensuring timely distribution of funds, and determining allowability of costs?	

Financial Questions	Response
3. Does the agency have on-file an approved cost allocation plan? Was this plan board approved? If so, when? Has it been submitted to the Iowa DOT?	
4. Is the agency's accounting system set up on an accrual or cash basis?	
5. How does the agency determine the amount of state and federal funding for each of the agency's services/ subcontractors?	
6. What other sources of funding are received for the transit services?	
7. What impacts to local funding (positive or negative) have occurred since the last compliance review?	
8. What impacts to local funding (positive or negative) are expected over the next three years?	
9. Does the agency utilize the "municipal transit levy"?	
10. How does the agency ensure that STA, FTA, and municipal transit levy funds are spent only on costs attributable to the public transit program?	
11. What happens to surpluses in the transit budget at the end of the year?	
12. How does the agency ensure that the fully allocated costs of providing incidental services (charter, meal deliveries, etc.) are covered other than by state or federal transit funds?	

Financial Questions	Response
13.What does the agency do with any profits earned from provision of incidental services?	
14.Has the agency received any rebates for items purchased with federal assistance? If so, how was the accounting for those rebates handled?	
15.Describe how the agency assures that vendors are paid no later than three working days following receipt of a capital reimbursement payment from Iowa DOT?	
16.How does the agency handle proceeds from the sale of FTA-funded equipment? Have any vehicles or equipment sold for over \$5000 from 11/15/21-10/31/2024, or over \$10,000 since 11/1/2024?	
17.Are there any public transit services funded with FTA Section 5311 dollars provided wholly within an urbanized area (origin and destination within the urbanized area)?	
18.Provide the date the last annual financial audit was submitted to the Iowa Auditor of State?	
19.In the last three years, were there any findings in audits relating to FTA or DOT funding programs? If so, what were the findings? What is the status of addressing those findings?	

Section 5: General ADA

General ADA Questions	Response
1. How many non-ADA revenue vehicles does the agency have including spare vehicles? Are these vehicles designed/purchased without ADA features or is the lift or ramp out of order?	
2. How does the agency handle the situation if the agency receives a ride request from a person using a wheelchair in an area or time when a non-ADA vehicle is normally used?	
3. Are ADA service needs met with the current fleet?	
4. What happens if the agency receives more requests from persons using wheelchairs for a particular trip or service than the vehicle has securement locations for?	
5. Does the agency require that the wheelchairs be secured? Will the agency still transport the passenger if the driver is not able to secure the wheelchair?	
6. Do you require the passenger to sign a waiver? Do you still provide the ride if the passenger refuses to sign the waiver? Please provide a copy of the waiver if you use one.	
7. Are there types of wheelchairs the agency won't transport?	

General ADA Questions	Response
8. Does the agency require that persons using wheelchairs use seatbelts (personal restraints)? If so, are all passengers required to use seatbelts?	
9. If transporting scooters or other wheelchairs with little structural integrity, does the agency require transfer to a vehicle seat?	
10. What is the transit agency's policy for the DOT ADA requirement of requesting that persons sitting in priority seats and any fold-down seats over the securement area vacate those seats when a person with a disability needs to use them?	
11. How does an agency determine if an animal is a service animal? What types of service animals are accepted in vehicles and facilities?	
12. How does the transit agency ensure that personnel and subcontractors are trained to proficiency so that they operate vehicles and equipment safely, and properly assist and treat individuals with disabilities who use the service with respect, courtesy and sensitivity?	
13. Do you allow persons to carry compressed oxygen canisters aboard your vehicles?	
14. Can a person not using a wheelchair request to ride a wheelchair lift?	

General ADA Questions	Response
15.Are wheelchair users, and other persons with disabilities, charged the same fare as other persons of like age/situation?	
16.What efforts have been undertaken to make agency information (brochures, schedules, maps, dispatch, etc.) accessible to people with hearing and/or visual impairments?	
17.Does all literature/advertising include information that all services are open to the general public, including persons with disabilities?	
18.Are all the agency's offices, meeting rooms, ticket locations, and facilities accessible to all persons with disabilities?	
19.Does the agency have job descriptions for all positions, which describe the essential functions of the position?	
20.Are public meetings held at times when public transit services are available and on a bus route?	
21.Describe how the agency would accommodate a participant with hearing impairments or speech impairments at one of the meetings. Is this accommodation included in the public notice?	

General ADA Questions	Response
22.What is the procedure for responding to ADA Reasonable Modification requests? Has the transit agency received any requests for reasonable modifications to the agency's service? If so, what was requested and what was the transit agency's response?	
23.For what reasons would the public transit agency deny a request for modification to the agency's policies and procedures?	
24.What is the procedure for responding to General ADA complaints? How are the complaints and their responses documented?	

ADA Paratransit Questions	Response
1. Does the transit agency provide ADA Complementary Paratransit via separate, dedicated vehicles or via route deviation of its regular fixed route buses?	
2. Describe the service area that is covered with ADA paratransit service.	
3. Does ADA complementary paratransit service operate at all times that fixed-route service is available? Is this stated on published route maps, brochures and agency websites?	

ADA Paratransit Questions	Response
4. Who is eligible for paratransit service, and how is eligibility determined? Who decides if a person is eligible or denied?	
5. How long does the eligibility determination process take, from application to approval or denial?	
6. How are the agency's policies on ADA complementary paratransit eligibility denial of services documented and communicated to the public?	
7. What opportunity for appeal or administrative review is offered? Do applicants have at least 60 days to appeal?	
8. Is a decision for the appeal made within 30 days of completing the appeals process? Is paratransit service provided until the decision is made?	
9. Are visitors to the agency's area eligible for paratransit service? Are visitors' requests made within one day?	
10. Does a person need to be a resident of the community to apply for permanent paratransit services?	
11. Does the agency issue an ID card to paratransit eligible persons? Are paratransit IDs honored that are issued from another transit agency?	

ADA Paratransit Questions	Response
12. Will drivers go to the door of a passenger's home or drop off location to assist a passenger in getting to/from a paratransit vehicle?	
13. Can an eligible rider call in at 4:00 pm today for a ride at 8:00 am tomorrow morning?	
14. How far ahead can reservations be made?	
15. Describe how the agency defines a trip denial, missed trip, on-time performance, and excessively long trip.	
16. How does the agency handle a caller who requests a ride at a time when the paratransit vehicle(s) is/are busy?	
17. In an average month how many ride requests is the agency unable to serve within 60 minutes of the requested time? What percent is this of total ride requests? Is there documentation?	
18. Does the agency meet the pick-up schedule set with the rider? Does the agency have documentation of on-time performance for pick-ups?	
19. How does the agency verify that paratransit trips are not excessively long?	
20. What is the fare for a paratransit service? How does this compare to the fare for an able-bodied person to take a similar trip aboard the fixed-route service?	

ADA Paratransit Questions	Response
21.Are there restrictions on how often or the purpose for which an eligible person may ride the paratransit service?	
22.Does the agency allow a non-disabled family member or friend to accompany an ADA eligible paratransit rider?	
23.Does the agency have a paratransit no-show policy? Before suspending service, is the rider notified and given the opportunity to respond?	

ADA Fixed Route Questions	Response
1. Do all fixed-route vehicles over 22' have public address systems and separate stop request signaling system in wheelchair securement area?	
2. Do the agency's drivers announce all major intersections, major stops and transfer points? Will drivers announce other stops or locations if it requested by the rider?	
3. How does the agency verify compliance with these requirements?	
4. Has the agency reviewed routes to identify appropriate places to deploy wheelchair lifts/ramps? Are there any locations where a driver would not allow a person using a wheelchair to get on or off the vehicle?	

ADA Fixed Route Questions	Response
5. How would the driver handle deboarding a wheelchair on a street with curbs but no sidewalks?	
6. What means are provided to allow a person with visual disability to find the correct vehicle at stops served by multiple vehicles?	
7. How quickly are vehicles removed from route service once a non-functional lift is reported?	
8. Does the agency allow buses with inoperable lifts to be assigned to route service? How long would this vehicle stay assigned to the route with an inoperable lift?	
9. How many passenger shelters does the agency have?	
10. Has an assessment for ADA compliance been done at each shelter? Are all shelters accessible to wheelchairs?	

Section 6: Drug and Alcohol

Drug and Alcohol Questions	Response
1. Does the agency have a written Drug and Alcohol Testing Policy with a date indicating that it was adopted by the governing board of the employer? Does the agency use the FTA policy builder to create the Drug & Alcohol Testing Policy?	

Drug and Alcohol Questions	Response
2. Does the agency have documentation that each employee has received a copy of the testing policy? Are new copies distributed when the document is updated?	
3. Does the agency have documentation that all employees have received training on the consequences of using illegal drugs and of misusing alcohol?	
4. Have the supervisors of commercial motor vehicle drivers and those making decisions regarding reasonable suspicion, received the required 2 hour supervisor training consisting of 60 minutes of training on the symptoms of alcohol abuse and another 60 minutes of training on the symptoms of controlled substances use?	
5. Under Iowa Code 730.5, non-governmental, private non-profit public transit agencies need to receive a minimum of one hour refresher training to recognize the signs of drug use/alcohol misuse annually. Has this been completed?	
6. Does the agency keep a record of employees selected for random testing, and whether the tests were actually conducted?	
7. If the agency has had employees selected for random testing, that were not tested, does the agency have documentation of the reasons why the test was not completed?	

Drug and Alcohol Questions	Response
8. Describe the security measures taken by the agency to keep employee test records/results confidential. Is the file cabinet containing employee test records/results locked, except when accessing the file? Do you receive electronic results and CCFs? If so, how do you keep electronic records/results secure?	
9. Who has access to these records/results?	
10. How are tests results received from the BAT or MRO? Who receives the results? Who files the results?	
11. If the employee authorizes release of test results (possibly to a potential new employer or to a court), who is involved in transmitting the information?	
12. Describe the security measures taken to keep the list of employees selected for random testing confidential.	
13. Who selects employees for random testing?	
14. Is the agency part of an alcohol and drug testing consortium? If yes, how many organizations take part in the consortium?	
15. How does the agency monitor vendors, consortia, third party administrators, collection sites, medical review officers, etc. to ensure compliance with program requirements?	

Drug and Alcohol Questions	Response
16.If selection is by an outside party, how does the agency receive selection information? Who has access?	
17.How are employees notified to report for collection? Who is involved in the process?	
18.Who determines when collection will be conducted for selected employees?	
19.What criteria are used to schedule collections?	
20.Do you have collections sites available to test at all days and hours of operation? If not, what measures are you taking to ensure testing site availability in your area?	
21.How much time is an employee given from time of notification to report to the collection site?	
22.Are substitutes used to fill in while the selected employee reports for collection? If so, how is notification to substitute handled?	
23.If substitutes are not used, how does the agency cover for the employee sent to the collection site?	
24.Is the collection site informed who will be reporting and when they should arrive? If so, who handles this notification?	
25.Does the collection site notify the transit agency once the employee has reported? If so, who receives this information?	

Drug and Alcohol Questions	Response
26. Do agency's testing records include the time of the notification and the time of report to collection site for all random tests?	
27. Under what circumstances does the transit agency conduct post-accident testing? Does the agency have a post-accident decision making form? Who decides if the accident involves disabling damage?	
28. How is the decision-maker made aware of accidents? Does this happen quickly enough to allow compliance with the post-accident testing timeframes? What if the decision-maker is unavailable?	
29. Do agency's testing records document all accidents/incidents, indicating which meet FTA post-accident testing thresholds, and documenting reasons why testing was not done? Have there been any accidents which should have triggered testing, but no timely testing was conducted? If so, explain why.	
30. Who makes the decision whether to send a driver and/or others for collection following a fatal accident?	
31. Who makes the decision whether to send a driver and/or others for collection following a non-fatal accident?	

Drug and Alcohol Questions	Response
32. Who makes the decision on whether to send an employee for reasonable suspicion testing? Has this person received the required supervisor training to recognize signs of drug use and alcohol misuse?	
33. Does the agency have a form to document determination of reasonable suspicion? Are these kept as part of the testing program records?	
34. At what point in the hiring process are applicants placed in safety-sensitive positions?	
35. Have any non-safety-sensitive employees transferred to a safety-sensitive position? If so, did they first pass an FTA pre-employment drug test?	
36. Were previous DOT-covered employers from the last two years queried about drug and alcohol tests results for any employee hired or transferred into a safety-sensitive position?	
37. Has the agency been asked about drug and alcohol tests of former employees? Was the query accompanied by a signed release? Did the agency provide all the information in a timely manner?	

Drug and Alcohol Questions	Response
38. Does the agency have a policy on employing a person who has previously had non-negative test or test refusal? If so, what is it? Is it consistent with the agency's second chance policy?	
39. Is any drug or alcohol testing conducted under the employer's own authority? Is a non-federal chain of custody form used?	
40. Has the agency had any job applicants with non-negative test results? If so, were they provided with information on available SAPs?	
41. How long are records maintained relating to verified positive test results and test refusals?	
42. Are all drivers listed on the vehicle insurance policy included in the random testing pool? If not, why?	

Section 7: Procurement

Procurement Questions	Response
1. Have procurement procedures been addressed in any agency audits? If so, what was the finding/recommendation?	
2. Are the agency's policies and procedures for transit procurements documented? When was the agency's procurement policy and procedure officially adopted by the governing board?	

Procurement Questions	Response
3. Does the agency maintain written standards of conduct for its representatives engaged in the selection, award, and administration of FTA-funded contracts?	
4. How does the agency notify the public of the written protest procedure?	
5. Have there been any procurement protests over the past three years? If so, what was the outcome?	
6. Have there been any complaints about violation of state and federal law or regulations in procurement actions? If so, what was the complaint and how was it resolved?	
7. If the transit agency is housed within/managed by another entity (COG, city, etc.), how does the transit agency manage FTA-related procurement functions?	
8. If the procurement function is handled by a separate department/person outside of the transit agency, how does the transit agency ensure that FTA-funded procurements are compliant with FTA requirements?	
9. What training has been provided to individuals who are responsible for procurement?	

Procurement Questions	Response
10.What involvement does the agency/s policy board have in procurements? Has the board overturned staff recommendations on any procurements involving transit?	
11.Have any items charged to the public transit program over the past three years been purchased from businesses owned by board or staff members of the agency or by members of their families? If so, please explain how a conflict of interest was avoided.	
12.Are solicitations and contractual provisions reviewed by legal counsel for conflicts with federal procurement law, state or local law or board policies?	
13.Have there been any violations of the rules governing the acceptance of gifts, gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to sub agreements? If so, were sanctions imposed? If not, why?	
14.Does the agency incorporate any preference for local vendors or Iowa vendors in procurements using federal funds?	
15.Does the agency have a record of the history of each procurement charged to the transit program over the last three years? What information is recorded?	

Procurement Questions	Response
16.Does the agency have signed pre-award and post-delivery audit procurement certifications, on file for all revenue vehicles bought over the last three years?	
17.For debarment and suspension certifications, has the agency done a full search on the System for Award Management (sam.gov) to verify excluded parties are not participating in the covered transactions valued over \$25,000? Does this search include subcontractors? Is the search signed, dated and kept on file?	
18.Does the agency annually obtain, and keep on file, lobbying certifications from all service subcontractors, and all procurements, each valued over \$100,000?	
19.For all state and FTA-funded procurements valued over \$15,000, has the agency submitted the procurement documents to Iowa DOT for review?	
20.How many emergency purchases were made over the last three years?	
21.Does the agency use brand names in procurement specs? If so, are equals allowed and has the agency defined what the salient features of the brand name product are?	

Procurement Questions	Response
22. When using FTA micro purchase procurement method, how does the agency determine that the price is fair and reasonable?	
23. For micro purchase where FTA's noncompetitive process is followed, how does the agency assure an equitable distribution of awards among qualified vendors?	
24. Describe how the transit agency determines whether to do an Independent Cost Estimate (ICE) and/or a Cost Price Analysis before receiving bids or proposals?	
25. Describe how the transit agency ensures applicable clauses and certifications are included in FTA-funded procurements. What resources are used to verify they are current?	
26. Within the last three years have any procurements been awarded to other than the lowest responsive and responsible bid/quote? If so, please describe the situation.	
27. If advance payments were made under any capital grants, were federal funds drawn down prior to the delivery of the merchandise or performance of the services involved?	
28. Has the agency made any progress payments under any FTA capital project? If so, was title to the completed work obtained prior to requesting federal reimbursement?	

Procurement Questions	Response
29. In the past three years, has the agency collected liquidated damages under any transit procurement? If so, were the damages collected credited back to the grant funding the procurement?	
30. Who makes the determination to seek DBE participation in any particular procurement?	

Section 8: Maintenance

Maintenance Questions	Response
1. Describe the resources (organizational structure, staffing levels, experience, etc.) assigned to maintenance of FTA and Iowa DOT funded assets, including resources of third-party contractor if maintenance is contracted. What technical training have maintenance employees had? Does the transit agency have certification requirements for maintenance employees?	
2. Does the agency have a written maintenance plan for FTA funded assets including vehicles, facilities and equipment?	

Maintenance Questions	Response
3. Regardless of funding source for the transit agency's facility(ies), US DOT ADA regulations require all facility accessibility features to be maintained and operational. How does the transit agency ensure that facility accessibility features are maintained in operational condition?	
4. How many FTA- and /or Iowa DOT funded facilities does the transit agency have? How many of each: maintenance, administrative, and storage? Please note the funding source(s).	
5. Are the facilities used for non-transit purposes? If so, which ones and how are they used?	
6. Has the transit system deferred any facility or equipment maintenance since the last compliance review? Please describe the reasons for deferring.	
7. Does the facility maintenance program include inspections and preventive maintenance activities to ensure that assets are protected from deterioration and reach their maximum useful life? Is the program consistent with manufacturers' minimum maintenance requirements for equipment under warranty?	

Maintenance Questions	Response
8. What is the agency's schedule for facility and equipment preventive maintenance inspections? Are they being done as scheduled? If not, why?	
9. Do the preventive maintenance schedules in the plan meet the minimums required by the manufacturers?	
10. Is all work required by the manufacturer's warranty provisions being performed? If not, why?	
11. Are vehicle preventive maintenance inspections being done as scheduled? If not, why?	
12. Has the transit system deferred any vehicle maintenance since the last compliance review? Please describe the reasons for deferring.	
13. Does the agency have any federally funded vehicles which traveled less than 10,000 miles last year? If so, provide the vehicle number(s) and reasons why.	

Section 9: Subcontractor Compliance

Subcontractor Compliance	Response
1. Does your agency purchase services from other transportation providers (subcontractors)? If no, end the questionnaire here. If yes, list the subproviders and the service they provide. Complete the rest of the questions in Section 9	

Subcontractor Compliance	Response
2. Does the agency have a signed purchase of service contract with each of the subcontractors listed? Does the purchase of service contract pass along all federal requirements connected to the transit program? Have all contracts been submitted to the Iowa DOT PTT within 90 days of contract start?	
3. How does the agency monitor subproviders for compliance with all state and federal requirements (Title VI, ADA, Drug & Alcohol)? Does the agency perform reviews or site visits to subcontractors? How often, and what items are reviewed? When was the last time you visited each subprovider?	
4. Describe how the agency ensures that subcontractors adhere to all relevant ADA complementary paratransit requirements?	
5. How often does the transit agency provide training and technical assistance to subproviders in meeting Federal and State requirements? Please describe the training and technical assistance process. Are the subproviders encouraged to attend FTA, Iowa DOT and IPTA sponsored training?	
6. How does the agency monitor use of state or FTA-funded property by subcontractors?	

Subcontractor Compliance	Response
7. What greeting is used when a subcontractor answers the phone?	
8. Describe any incidental services or charter services provided by a subcontractor. How does the agency ensure compliance?	
9. How does the transit system ensure subcontractors comply with school bus regulations?	
10.If subcontractors provide transit service for the agency, are they responsible for setting their own fares? If so, do those subcontractors have their own policies for soliciting and considering public comments prior to a fare increase or major service reduction? How does the transit agency ensure the subcontractors comply with the public comment process requirements?	
11.If the agency subcontracts for any safety-sensitive functions other than third-party maintenance, does the contract specifically require compliance with FTA drug and alcohol testing?	
12.How does the transit agency monitor subrecipients with safety-sensitive employees to ensure their drug and alcohol testing programs are administered in accordance with regulations?	
13.Has the subcontractor's list of covered employees been reviewed?	

Subcontractor Compliance	Response
14. Is the post-accident testing record of the subcontractor compared to accident reports received?	
15. Who is responsible for maintaining vehicles under a user agreement to subcontractors? Is this documented in the contract with the subcontractor?	
16. For vehicles under a user agreement with a subcontractor, what process does the transit agency use to monitor compliance with the vehicle maintenance requirements, including ADA requirements?	

Attachment 3: Iowa DOT FTA Title VI Program Template

FTA Title VI Program

General Template for all FTA Subrecipients

Date:

FTA Title VI Program 2026

Template Revised 7/15/2026

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Charts (Heading 3).....	Error! Bookmark not defined.

Date:

Subrecipient Profile

Subrecipient:

Administrative Head:

Subrecipient Title VI Coordinator:

Address:

City/State/Zip Code:

Phone:

Email:

Website:

Has the subrecipient signed and submitted its Title VI Assurances? Y or N

General Requirements

- ✓ Attach a copy of Title VI notice to the public. The Title VI notice should include:
 - A statement that the agency operates programs without regard to race, color, or national origin
 - A description of the procedures that members of the public should follow in order to request additional information on the Title VI obligations.
 - A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient.
- ✓ Include a list of the locations where the notice is posted:
- ✓ Attach a copy of the instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.
- ✓ Provide the link to the transit agency website where Title VI complaint procedure and the complaint form are posted.
- ✓ List and describe all public transportation-related Title VI investigations, complaints or lawsuits filed in the last three years. Please only include only those that pertain to allegations of discrimination on the basis of race, color, and/or national origin.

Title VI Complaints, Investigations, and Lawsuits

Investigations	Date Filed	Summary	Status	Actions Taken
Complaints	Date Filed	Summary	Status	Actions Taken
Lawsuits	Date Filed	Summary	Status	Actions Taken

- ✓ Attach a public participation plan that includes an outreach plan to engage minority and limited English proficient populations. Include a summary of outreach efforts made in the last three years.
- ✓ Attach a copy of the plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.
<https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>
 - What steps has the agency taken to ensure meaningful access to the benefits services, and other important components of its programs and services to persons with limited English proficiency?
- ✓ List all non-elected committees and councils, the membership of which is selected by the agency:
- ✓ Describe the process the agency uses to encourage the participation of minorities on such committees:

Racial/Ethnic Breakdown of the Non-Elected Committees and Councils:

Group	Number
Male	
Female	
White	
Black or African American	
American Indian or Alaskan Native	
Asian	
Native Hawaiian or other Pacific Islander	
Other	

- ✓ If the transit agency has subcontractors, describe the efforts made to ensure subcontractors are complying with Title VI. Include a schedule of Title VI Program submissions from that subcontractor.
- ✓ If the transit agency has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility to ensure the location is selected without regard to race, color, or national origin.
- ✓ Attach a copy of board meeting minutes, resolution, or other documentation showing the board of directors or appropriate governing entity has reviewed and approved the Title VI Program.

Requirements for Fixed Route Transit Providers

- ✓ System-wide service standards for each mode of service provided, whether existing or new. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets.
 - Vehicle load -Can be expressed as the ratio of passengers to the total number of seats on a vehicle. A vehicle load standard is generally expressed in terms of peak and off-peak times. The standard may be different for each mode.
 - Vehicle headway - The amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time. Transit providers may set different vehicle headway standards for different modes of transit service.
 - On-time performance -A measure of runs completed as scheduled. Define what is considered on-time. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route.
 - Service availability - A general measure of the distribution of routes within a transit provider's service area.
- ✓ System-wide service policies ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin.
 - Distribution of transit amenities for each mode - Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed route transit providers must set a policy to ensure equitable distribution of transit amenities across the system.
 - Seating
 - Bus shelters

- Information
 - Escalators
 - Elevators
 - Waste receptacles
- Vehicle assignments for each mode - Refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition.

Requirements for Planning Agencies

- ✓ A demographic profile that includes identification of the minority populations in the aggregate.
- ✓ A description of the procedures by which the mobility needs of minority populations are identified and considered in the planning process.
- ✓ Demographic maps that overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes.
- ✓ Describe the procedure the agency uses to ensure nondiscriminatory pass-through of FTA financial assistance.
- ✓ Provide a description of how the planning agency develops its competitive selection process or annual program of projects submitted to Iowa DOT as part of its grant applications. This description shall emphasize the method used to ensure the equitable distribution of funds to subrecipients that serve predominantly minority populations including Native American tribes, where present.
- ✓ Provide a description of the planning agency's criteria for selecting entities to participate in FTA grant programs.

Attachments

Declaration of the Respondent

I declare that I have provided information as part of the Title VI Program to the best of my knowledge and believe it to be true, correct and complete.

Signature of Respondent:

Date:

Declaration of the Administrative Head

I declare that I have reviewed and approved the information provided in the Title VI Program and to the best of my knowledge believe it to be true, correct and complete.

Signature of Respondent:

Date: