FFY 2026

FMCSA

Title VI/Nondiscrimination Program

Ensuring Justice

June 2026

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SECTION 1: PROGRAM OVERVIEW

Introduction

The Iowa Department of Transportation (Iowa DOT) is a recipient of Federal Financial Assistance. All recipients are required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964 which forbids discrimination against anyone in the United States because of race, color, or national origin by any agency receiving Federal Funds. The Federal-Aid Highway Act of 1973 added the requirement that there be no discrimination on the grounds of sex.

Additionally, the Civil Rights Restoration Act of 1987 defined the word “program” to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives Federal Financial Assistance.

The Iowa DOT is to ensure that none of its activities or programs treats any part of the community any differently than another. The Iowa DOT expects every manager, supervisor, employee, and sub-recipient of Federal-Aid Funds administered by the Iowa DOT to be aware of and to apply the intent of Title VI of the Civil Rights Act of 1964 in performing assigned duties.

The Federal Highway Administration (FHWA), Federal Transit Administration (FTA,) and Federal Motor Carrier Safety Administration (FMCSA) require recipients of Federal-Aid Funds to prepare a plan to define roles, responsibilities, and procedures established to ensure compliance with Title VI of the Civil Rights Act of 1964.

The Iowa DOT’s Title VI/Nondiscrimination Program Plan focuses on functional areas with significant public contact responsibilities and provides the policy direction necessary to ensure compliance with Title VI of the Civil Rights Act of 1964.

Policy statement of nondiscrimination

The Iowa Department of Transportation, hereinafter referred to as the Iowa DOT, through enactment of this program, hereby assures that no person 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 otherwise subjected to discrimination under any program or activity receiving federal financial assistance. The Iowa DOT further assures every effort will be made to ensure nondiscrimination in all its programs and activities, regardless of whether those programs and activities are federally funded. See also: *Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, and the Civil Rights Restoration Act of 1987, Pub. L. No. 100-259, 102 Stat. 28*)

It is the policy of the Iowa DOT to comply with: *49 CFR Part 21*; *49 CFR Part 303*; Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e; Age Discrimination Act of 1975, 42 U.S.C. §§ 6101-6107; Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 U.S.C. §§ 4601-4655; 1973 Federal Aid Highway Act, 23 U.S.C. § 324; Title IX of the Education Amendments of 1972, Pub. L. No. 92-318, 86 Stat. 235; Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. §§ 701 et seq; Civil Rights

Restoration Act of 1987, Pub. L. No. 100-259, 102 Stat. 28; Americans with Disabilities Act of 1990, 42 U.S.C. §§ 12101 et seq.; Title VIII of the Civil Rights Act 1968, 42 U.S.C. §§ 3601-3631; and the FMCSA Title VI Program Assurance (see: page 25).

The Civil Rights Restoration Act of 1987, Pub. L. No. 100-259, 102 Stat. 28, broadened the scope of Title VI coverage by expanding the definition of terms “programs or activities” to include all programs or activities of federal-aid recipients, subrecipients and contractors/consultants, regardless of whether such programs and activities are federally assisted.

Pursuant to the requirements of Section 504 of the Rehabilitation Act of 1973, Pub. L. No. 93-112, 87 Stat. 355, the Iowa DOT hereby gives assurance that no qualified disabled person shall, solely by reason of disability, be excluded from participation in, be denied the benefits of or otherwise be subjected to discrimination, including discrimination in employment, under any program or activity that receives or benefits from this federal financial assistance.

Additionally, the Iowa DOT will take reasonable steps to provide meaningful access to services for persons with limited-English proficiency. The Iowa DOT will, where necessary and appropriate, revise, update and incorporate nondiscrimination requirements into appropriate manuals, directives and regulations.

In the event the Iowa DOT distributes federal-aid funds to a second-tier subrecipient, the Iowa DOT will include Title VI language in all written agreements.

The Iowa DOT’s Civil Rights Bureau Director, is responsible for initiating and monitoring Title

VI activities, preparing reports and performing other responsibilities, as required by 23 C.F.R. §

200 and 49 C.F.R. § 21.



Scott C. Marler
Director, Iowa Department of Transportation

6/30/2026
Date

FMCSA Title VI Program Assurances

49 C.F.R. § 21.7

Fully executed standard DOT assurances (including Appendices A, B, C, D and E) are attached to this plan. (Attachment A)

SECTION 2: PROGRAM ADMINISTRATION

Program Administration — General

As authorized by the Iowa DOT's Director, under the direct supervision of the Chief Operating Officer, and the Administrative Services Division Director, the Civil Rights Bureau Director is responsible for initiating, monitoring, and ensuring Iowa DOT's compliance with Title VI requirements as follows.

A. Complaints and Disposition

If any individual believes that he/she or any other program beneficiaries have been subjected to unequal treatment or discrimination in their receipt of benefits and/or services, on the grounds of race, color, national origin, sex, age, or disability, he/she may exercise their right to file a complaint with the Iowa DOT. Every effort will be made to resolve complaints informally at the district/division, sub-recipient, and contractor level. Complaint forms, instructions and general information about the complaint process is available on the DOT's website or upon request. The Iowa DOT received 7 Title VI/ADA complaints filed for this fiscal year (5 administratively closed, 2 in progress).

The Iowa DOT's Civil Rights Bureau (CRB) maintains the complaint log and a file that includes at minimum the following: investigative plan, investigation report, investigative findings and remedial action taken as described in its Discrimination Complaint Process (Attachment B).

B. Training Programs

The Iowa DOT is committed to ensuring that all employees understand their responsibilities under Title VI and related nondiscrimination statutes. Training supports equitable service delivery, respectful customer interactions, and consistent application of policies across the agency.

Title VI Training:

Title VI training is provided to all new Iowa DOT employees through New Employee Orientation (NEO). A comprehensive Title VI training module was initially developed and delivered to special emphasis program areas in Federal Fiscal Year (FFY) 2018 and continues to be offered in alternating years. Supplemental refresher courses are administered during odd-numbered years.

Training includes job-specific considerations and utilizes the Iowa DOT Title VI Program Policy Statement as its foundation. Delivery methods include in-person instruction, PowerPoint, facilitated discussions, and interactive components. Refresher training may be offered via online modules with required knowledge checks.

Motor Vehicle Division. all staff training:

- Crucial Conversations
- Harassment (annual)
- DL Issuance Workshop- Includes respectful conversations around disability indicators, autism indicators, and driver fitness, guidance on discreet, equitable customer interactions
- New Employee Orientation- Emphasizes consistency, customer respect, and equitable service for all
- Selection Panel Member Training- Required for consultants, leadership, and supervisors involved in hiring
- Preventing Sexual Harassment for Employees
- Human Trafficking Awareness Training for MVD & Frontline Staff
- New Employee Welcome ("People Matter" section)

Motor Vehicle Division. additional leadership training:

- Preventing Sexual Harassment for Managers and Supervisors (annual)
- MVD Accessibility Overview and Training
- Preventing Sexual Harassment for Supervisors
- Risk of Inaction: The Perils of Failing to Report Sexual Harassment
- Foundations of DEI (DOT Leadership Master Class Series)
- Leave of Absence for Managers and Supervisors
- Leading with CARE
- Employee Relations for People Leaders
- People Matter STRONG (Strategies for Trust, Resilience, Openness, Nurturing, and Growth)
- Crucial Conversations (reinforced leadership delivery)
- Crucial Accountability (reinforced leadership delivery)

C. Access to Records

The Iowa DOT's Motor Vehicle Division will provide annual activity reports to FMCSA, as required. Additionally, all other records and documentation are available to FMCSA staff upon request.

D. Notification to Beneficiaries and/or Participants

Title VI and Nondiscrimination Notice to the Public

The Iowa DOT has posted the notice electronically at the weblink provided and hard copy in public access facilities.

E. CMV Inspection Selection & Unbiased Enforcement Policies

Iowa DOT personnel does not conduct enforcement activities.

F. Status of Corrective Actions

There were no Title VI reviews conducted during FFY 2025

G. Sub-recipient Compliance Reports

Iowa DOT does not intend to sub-grant any portion of funding received from FMCSA.

H. Community Participation Process

MVD creates annual goals, in part, based on their community participation, specifically with underserved community groups.

The MVD's Motor Carrier Services (MCS) business is with commercial registration (IRP), overweight and oversized permits (OS/OW permits), and international fuel taxes (IFTA), they are utilizing a continuous community and ongoing communication with IMTA for outreach plan with an impetus on education and outreach. The Iowa Department of Transportation Policy & Partnerships Bureau has developed and host training sessions for FY2025 and 2026 that cover topics of interest for commercial motor carriers. Educational and discussion topics include IRP, IFTA, and OS/OW permitting.

In the event of decreasing services, the following apply:

1. Outage or facility issue. In the event of a localized or regional outage (systems down, internet down, or facility closure due to Act of God), we work to notify the public through written and online notices with information about where they can access these services in a surrounding county. Notification about other services (Kiosk and online services for obtaining an identification card or driver's license) are also communicated to the affected public.
2. Closure due to training. We make every attempt to hold localized or state-wide closure during a time that will cause the least disruption to the public. This includes not closing on highest volume days and times and providing notification to the public well in advance of closure (generally 4 weeks) in local, written, and online form of notification. Highlighting of other services available during closing also communication to the public (Kiosk and online services).
3. Decrease of services or change of location. In the event of a complete closure or loss of services in a location, this is in consultation with the legislature. Items 1-12 listed below are in place and enacted, including an analysis of potential benefit or detriment to the surrounding community for loss of services. If hours of service availability are changed, a written proposal is provided along with data to support the change request, to divisional and agency leadership for consideration. Analysis may include qualitative interviewing of public and staff, surveying of surrounding jurisdictions to compare action plan to how business is conducted within the counties who conduct business independent of Iowa DOT service hours. Regardless of change (increase or decrease of services at a localized or state-wide level), we conduct outreach to identified stakeholders (we maintain a contact list for all of our stakeholders (customer contact database, IMTA,

IFTA/IRP agents, county treasurers, etc.). Outreach, depending on the level of severity of affected services, may be communicated in written format and provided in the form of a memo, be conducted on-site or in-person via a stakeholder or publicly held meeting, by mail or e-mail, posted online or in print, or a combination of methods. We make every attempt to ensure that any change or reduction in hours of services do not remove any services to the public. The identified 1-12 steps below are followed on a localized and state-wide level, when warranted:

1) Prepare a Stakeholders List. This Stakeholders List is to identify both affected customers (both benefited and burdened by the program) and any advocacy groups, churches, community-based organizations, other advisory bodies, etc. The list should also include demographic information for affected customers regarding race, color, national origin (including Limited English Proficient individuals), sex, age, and disability.

   a) The Stakeholders List must be sufficiently inclusive to ensure that the news of the proposed change(s) is communicated to the greatest number of customers;

2) Plan Public Meetings. Determine an effective number of Public Meetings to hold in strategically significant areas and at appropriate times to reach the greatest number of customers. Determine the method for and communicate news of the Public Meeting(s) to the greatest number of customers via hard copy publications (i.e., newspapers, newsletters, posters, etc.), electronic media (i.e., website, social media to include Facebook, twitter, etc.), and stakeholder groups listed above.

3) Publicize Proposed Changes. Determine how to communicate the news of the proposed change(s) to the greatest number of customers via hard copy publications (i.e., newspapers, newsletters, posters, etc.), electronic media (i.e., website, social media to include Facebook, twitter, etc.), and stakeholder groups listed above. This news should be communicated in an accessible and inclusive manner (including foreign language translations, if necessary) that promotes effective public participation and is free of linguistic, cultural, economic or historical barriers.

4) Conduct the Public Meetings. Ensure that reasonable time is provided for attendees to provide comments regarding the proposed change(s);

5) Review and Analysis. At the conclusion of the outreach effort, review the comments and analyze the impacts to all customers (regardless of a customer's race, color, national origin, sex, age, or disability) regarding their ability to access the facilities/services both prior to the proposed change(s) and following the proposed change(s). This analysis is required to be sufficiently detailed so that the conclusion as to how the proposed change(s) will impact customers is well-documented.

6) Written Report. Prepare a detailed record to capture all aspects of the outreach effort;

7) Submission to FMCSA. Submit the record to FMCSA. Please note that FMCSA reserves the right to offer comments as deemed appropriate following a review of the record;

8) Implement the change(s);

9) Monitor Feedback. Monitor customer communications for a period (i.e., six months, one year) for reactions to the change.

10) Re-Evaluate. Be prepared to adjust the change(s) as appropriate dependent upon the actual impact to customers;

11) Adjust. Adjust the change(s) as appropriate dependent upon the actual impact to customers.

12) Notification of Title VI Program Protections. Notify beneficiaries of protections available to them under the Title VI Program. Notify the public of procedures for filing a Title VI complaint. Please refer to the **Notification to Beneficiaries/Participants** section of this Plan regarding how to implement this requirement.

SECTION 3: Federal Aid Programs Grants Office

Summary of activities related to the HP-ITD Grant Program activities

Motor Vehicle Division

The Motor Vehicle Division (MVD) administers and enforces federal and state laws and regulations pertaining to vehicle titling and registration, vehicle operation and driver licensing, and legal identity. MVD handles transactions for 2.5 million Iowa residents holding driver license (DL) or identification (ID) products and for more than 4.5 million registered vehicles in the state. MVD also licenses and oversees operations for a variety of businesses, including vehicle dealers, third-party service provides and educators.

The division directly provides many different types of transactions and works with 99 Iowa county treasurer offices to fully deliver services to all residents and businesses of the state. It also works with the American Association of Motor Vehicle Administrators (AAMVA) to follow national standards and guidelines for motor vehicle and driver/ID services.

MVD is organized into a director's office and four Bureaus:

- The Director's office oversees and guides all Division operations and services and directly handles legislative activity and legal compliance.
- The Bureau of Enforcement, Auditing, and Records (BEAR) includes law enforcement officers and analysts that investigate fraud and other criminal practices relating to vehicle titling and registration, DL/ID products, vehicle dealer sales and MVD and county staff operations. Investigations may lead to criminal charges or sanctions against individuals or businesses. Additionally, BEAR is responsible for the division's records management and data privacy compliance.
- The Service Delivery Bureau (SDB) directly delivers services and products to Iowa residents and businesses, including DL/ID products, persons-with-disability parking products, personal plate orders, bonded title applications and motor carrier registrations, fuel taxes and permits. The Customer Services Bureau has 18 DL/ID service centers and works closely with 83 county treasurer offices to provide DL/ID services to all Iowa residents.
- The Policy and Partnerships Bureau supports our front-line staff with escalated inquiries from DL/ID service centers, and all 99 counties on DL and vehicle transactions. Additionally, they manage the training of all issuance staff throughout the state and manage relationships with key stakeholders.
- The Systems and Project Management Bureau (SPM) is responsible for the maintenance and support of multiple transactional systems and vendor relationships, and MVD's portfolio of system-related projects and enhancements. SPM provides, maintains, and improves system access and governance to all MVD and county treasurer employees and manages all

MVD equipment, inventory, supplies and contracts.

Assurances

- All MVD organizations and staff are directed and trained to assure that all products and services are provided in an equitable fashion to all customers regardless of color, race, or national origin.
- MVD provides training to all MVD and county treasurer staff to maintain understanding and awareness of Civil Rights issues and how to deliver services and interact with customers.
- SDB works with S&A staff and Iowa DOT staff to ensure that customer service centers meet all ADA requirements. SDB uses different methods and services to accommodate customers with limited English proficiency.
- BEAR ensures that all investigations and enforcement functions are carried out in equitable fashion.

Administration

In addition to the program mission as described above, there are a number of administrative areas which have Title VI implications. These include agency staff composition by race and gender, policies, procedures and directives; contracts, agreements, other legal instruments and proposed legislation; Title VI training; dissemination of information to the public and public involvement programs.

Assurance Activities

- Monitor continued progress on agency-wide Affirmative Action goals and encourage diversity with respect to protected classes in each of the pertinent program areas;
- Review policies, procedures, Iowa DOT directives and proposed legislation for Title VI issues;
- Ensure publications and other information disseminated to the public includes Title VI policy reference.

Community Participation Process

MVD creates annual goals, in part, based on their community participation, specifically with underserved community groups.

MVD FFY 2026 ACCOMPLISHMENTS (MVD)

The following were identified as FFY 2025 goals accomplished, because of the community participation process.

Goal	Projected Outcome	Outcome
IFTA and IRP 5-year cycle peer review.	Continue to evaluate data and records to meet the requirements of IFTA and IRP within our MCS.	Maintain compliance in accordance with the Internation Fuel Tax Association and International Registration Plan
Mobility and Identity collaboration with focus on underserved communities	Hold in-person oral testing group sessions to meet LEP needs of local communities in Iowa.	Program is “live” and continues to be a MVD priority
Host regular meetings for all underserved community groups (identified)	Serves as qualitative and quantitative collection of data for analysis	MVD participates in and/or hosts community engagement conversations that address identified underserved community groups (future meetings will be scheduled, as needed, and on an ongoing basis)
Create and distribute internal policy to reiterate MVD process for awareness in assisting customers with Civil Rights Complaints	Employee Awareness/Education	Ongoing
Audit Iowa DOT public-facing website to identify MVD pages for revision	Identify areas for opportunity and revisions to improve customer experience	Ongoing
Educate driver’s licensing staff on the immigrant and refugee experience to increase cultural awareness and customer sensitivity.	U.S. Committee for Refugees and Immigrants (USCRI) presented an informative training session during annual staff-wide conference.	Ongoing
Allow non-citizens to upload immigration documents	Create a link within Iowadot.gov where non-citizens can upload	Better prepare non-citizens and reduce

required to obtain an Iowa credential	required lawful status documents prior to their scheduled appointments.	the number of trips into a service center.
Assess data and needs on availability of language interpretation for driver resources and study materials	Identify and track usage trends to improve access to interpretation services across all service centers	Initial data collection process implemented; ongoing tracking and analysis will inform future resource allocation
CDL training activities for staff and third-parties	Ensure consistent and up-to-date training for MVD staff and third-party testers in alignment with federal and state requirements	Training curriculum reviewed and updated; sessions held quarterly for internal staff and approved third-party providers
MVD website updates, including the ongoing accessibility review	Improve accessibility, navigation, and content accuracy for all users, including those with disabilities	Accessibility audit underway; initial updates completed with additional phases scheduled for FY 2026

External Partnerships & Participation (MVD)

As no individual or community fits neatly into one description, there is the expectation and acknowledgment of diversity within these identified, underserved communities.

MVD partnerships and external participation may have overlap, serving multiple audiences and needs. Participation includes membership, attendance meetings, providing information, and requests for presentation.

The MVD, Bureau(s), or team(s) participate in the following:

Limited English Proficient (LEP):

Immigrant, Migrant & Refugee Populations

- United Way (New Iowan) Committee – OpportUNITY
- International Business Social at Iowa State University (foreign national students)
- Refugee Alliance of Central Iowa
- Iowa Transportation Coordination Council
- American Association for Motor Vehicle Administrators (AAMVA)
- Iowa Identity Theft & Victim Assistance Coalition (IITVAC)
- Iowa Department of Human Rights
    - Office of Latino Affairs

    - Office of Asian and Pacific Islander Affairs
    - Office of African American Affairs
    - Office of Native American Affairs
    - Office of Hearing-Impaired Affairs
- Iowa Bureau for Refugee Services
- Monsoon (Asian populations)
- Embark (Burmese ethnic minorities)
- Asian Alliance of Central Iowa
- United We March (Immigrant & Refugee communities in Cedar Rapids)
- Iowa Donor Network
- Catholic Charities Diocese of Des Moines
- USCRI (U.S. Committee for Refugees & Immigrants)
- Lutheran Services of Iowa
- Iowa Public Transit Bureau
- Goodwill of Central Iowa
- Iowa Economic Development Authority
- Monsoon Asians & Pacific Islanders in Solidarity
- Iowa Legal Aid
- Sioux City Townhall with COFA migrants
- Storm Lake townhall with COFA migrants
- Siouxland Asian Fest

Re-entry Populations

- United Way (Correctional) Committee – OpportUNITY
- Iowa Transportation Coordination Council
- Life Skills Courses at Iowa's Correctional Facilities (Mitchellville, Newton, Mt. Pleasant, Anamosa) – impetus on discussing driving records and eligibility, requirements, and alternative transportation options
- Department of Corrections Warden Meetings (collaboration and Iowa DOT presentations focusing on identity and mobility)
- Pilot issuance using DOT2Go to issue identification cards or driver's licenses to offenders at the Mitchellville Women's Correctional Facility, an effort to eliminate re-entry barriers
- American Association for Motor Vehicle Administrators (AAMVA)
- Iowa Identity Theft & Victim Assistance Coalition (IITVAC)
- Iowa Public Transit Bureau
- Iowa Economic Development Authority
- Iowa Workforce Development
- Iowa State Penitentiaries
- Department of Corrections
- Department of Health and Human Services

Aging Iowans

- Senior Fests throughout Iowa
- Senior and Veterans Wellness Fairs throughout Iowa
- Iowa Transportation Coordination Council
- AARP
- Lifesavers Conference
- Governor's Traffic Safety Bureau
- American Association for Motor Vehicle Administrators (AAMVA)
- Iowa Identity Theft & Victim Assistance Coalition (IITVAC)
- Iowa Public Transit Bureau
- Iowa Department on Veteran's Affairs
- StraighTalk Senior Living Support

Individuals with a Disability

- Iowa Transportation Coordination Council
- Iowa Department for the Blind
- Iowa Department of Human Services
- Disability Services
- Iowa Department of Human Rights
- Office of Deaf Services
- Iowa Disability Resources and Advocacy Organization
- Iowa Department on Veteran's Affairs
- Future Ready Iowa (occupational rehab)
- CarFit
- Lifesavers
- American Association for Motor Vehicle Administrators (AAMVA)

Attachment A

The United States Department of Transportation
Standard Title VI/Non-Discrimination Assurances
DOT Order No. 1050.2A

The ***Iowa Department of Transportation*** (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the United States Department of Transportation (DOT), through the **Federal Motor Carrier Safety Administration (FMCSA)**, is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq*., 78 Stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 *et seq*.), (prohibits discrimination on the basis of sex);
- Title IX of the Education Amendments of 1972, as amended, (20 U.S.C. § 1681 *et seq*.), (prohibits discrimination on the basis of sex in education programs or activities);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 *et seq*.), as amended, (prohibits discrimination on the basis of disability);
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 *et seq*.), (prohibits discrimination on the basis of age);
- Americans with Disabilities Act of 1990, as amended, (42 U.S.C. § 12101 *et seq*.), (prohibits discrimination on the basis of disability);
- 49 C.F.R. Part 21, including any amendments thereto (entitled *Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation—Effectuation Of Title VI Of The Civil Rights Act Of 1964*);
- 49 C.F.R. Part 27 (entitled *Nondiscrimination On The Basis Of Disability In Programs Or Activities Receiving Federal Financial Assistance*);
- 49 C.F.R. Part 28 (entitled *Enforcement Of Nondiscrimination On The Basis Of Handicap In Programs Or Activities Conducted By The Department Of Transportation*);
- 49 C.F.R. Part 37 (entitled *Transportation Services For Individuals With Disabilities (ADA)*);
- 49 C.F.R. Part 303 (FMCSA's Title VI/Nondiscrimination Regulation);
- 28 C.F.R. Part 35 (entitled *Discrimination On The Basis Of Disability In State And Local Government Services*);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

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

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

> *"No person in the United States shall, on the grounds of race, color, national origin, sex, age, or disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from DOT, including the FMCSA."*

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973) by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally-assisted.

Specific Assurances

More specifically, and without limiting the above general Assurances, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted **FMCSA Program**:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in 49 C.F.R. Part 21.23 (b) and 21.23 (e), including any amendments thereto, will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations;

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with the FMCSA Program and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

   > "*The **Iowa Department of Transportation**, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, all contractors will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of the owner's race, color, national origin, sex, age, or disability, in consideration for an award.*";

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations;

4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient;

5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith;

6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property;

7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:

    a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
    b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.

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 will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.

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

By signing this ASSURANCE, the Iowa Department of Transportation also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the **FMCSA** access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the **FMCSA**. You must keep records, reports, and submit the material for review upon request to **FMCSA**, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

The Iowa Department of Transportation gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the Department of Transportation under the **FMCSA Program**. This ASSURANCE is binding on Iowa, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the **FMCSA Program**. The person (s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Iowa Department of Transportation



by_____

Scott C. Marler, Director

DATED_____6/30/2026_____

APPENDIX A

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

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Motor Carrier Safety Administration (FMCSA), as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.

2. **Nondiscrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, national origin, sex, age, or disability, in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations as set forth in Appendix E, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 C.F.R. Part 21, including any amendments thereto.

3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, national origin, sex, age, or disability.

4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the FMCSA to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the FMCSA, as appropriate, and will set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the FMCSA may determine to be appropriate, including, but not limited to:

    a. withholding payments to the contractor under the contract until the contractor complies; and/or
    b. cancelling, terminating, or suspending a contract, in whole or in part.

6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the FMCSA may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

CLAUSES FOR DEEDS TRANSFERING UNITED STATES PROPERTY
APPENDIX B

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

NOW, THEREFORE, the Department of Transportation as authorized by law and upon the condition that the (***Title of Recipient***) will accept title to the lands and maintain the project constructed thereon in accordance with (***Name of Appropriate Legislative Authority***), the Regulations for the Administration of **Federal Motor Carrier Safety Administration (FMCSA) Program,** and the policies and procedures prescribed by the **FMCSA** of the Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, Department of Transportation, subtitle A, Office of the Secretary, part 21, Non-discrimination in Federally-assisted programs of the Department of Transportation, including any amendments thereto, 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 (***Title of Recipient***) 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 (***Title of Recipient***) and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the (***Title of Recipient***), its successors and assigns.

The (***Title of Recipient***), in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, national origin, sex, age, or disability, 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 (***Title of Recipient***) will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, subtitle A, Office of the Secretary, part 21, Non-discrimination in Federally-assisted programs of the Department of Transportation, including any amendments thereto, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the Department of Transportation and its assigns as such interest existed prior to this instruction.*

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

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

APPENDIX C

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

A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:

    1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, national origin, sex, age, or disability, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.

B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, (***Title of Recipient***) will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*

C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the (***Title of Recipient***) will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the (***Title of Recipient***) and its assigns.*

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

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

APPENDIX D

The following clauses will be included in deeds, licenses, permits, or similar instruments/ agreements entered into by (***Title of Recipient***) pursuant to the provisions of Assurance 7(b):

A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, national origin, sex, age, or disability, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, national origin, sex, age, or disability, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.

B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, (***Title of Recipient***) will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*

C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, (***Title of Recipient***) will there upon revert to and vest in and become the absolute property of (***Title of Recipient***) and its assigns.*

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

APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

- Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. § 2000d *et seq*.), (prohibits discrimination on the basis of race, color, national origin), as implemented by 49 C.F.R. Part 21.1 *et seq*., including any amendments thereto, and 49 C.F.R. part 303;
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601) (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973 (23 U.S.C. § 324 *et seq*.) (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794 *et seq*.) (prohibits discrimination on the basis of disability); and 49 C.F.R. part 27;
- The Age Discrimination Act of 1975, as amended (42 U.S.C. § 6101 *et seq*.) (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982 (Pub. L. 97-248 (1982)), as amended (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987 (102 Stat. 28) ("*….which restore[d] the broad scope of coverage and to clarify the application of title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and title VI of the Civil Rights Act of 1964*.");
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 -- 12189), as implemented by Department of Justice regulations at 28 C.F.R. parts 35 and 36, and Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. § 1681 *et seq*).

Attachment B

Discrimination Complaint Process

Introduction

The Title VI (and related statutes) discrimination complaint procedures are intended to provide aggrieved persons an avenue to raise complaints of discrimination regarding the Iowa DOT's programs, activities and services as required by statute.

Purpose

The purpose of the discrimination complaint procedures is to describe the process used by the Iowa DOT. These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 (Title VI), including Section 504 of the Rehabilitation Act of 1973 (Section 504), the Age Discrimination in Employment Act of 1967 (ADEA), Civil Rights Restoration Act of 1987 (CRRA), the Americans with Disabilities Act of 1990 (ADA), Disadvantaged Business Enterprises (DBE), Equal Employment Opportunity (EEOC), and On-the Job Training (OJT) Program components and applicable Department policies, regarding any program or activity administered by the Iowa DOT as they relate to local agencies, contractors and other sub-recipients of United States Department of Transportation funds. These procedures apply to complaints filed against a program or activity funded by the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration or Federal Motor Carrier Safety Administration.

Intimidation or retaliation is prohibited per Title 49 CFR 21.11(e).

These procedures do not deny or limit the right of a complainant to file a formal complaint with an outside enforcement agency (Iowa Labor Services, Iowa Civil Rights Commission (ICRC), Equal Employment Opportunity Commission (EEOC), U.S. Dept. of Transportation (USDOT), Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Federal Motor Carrier Safety Administration (FMCSA), or U.S. Dept. of Justice (DOJ) or to seek private counsel for complaints alleging discrimination.

Title VI procedures are part of an administrative process, which do not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Every effort will be made to obtain early resolution of complaints at the lowest level possible and with guidance of the USDOT modality (FMCSA, FTA, FAA) with jurisdiction over the matter per 49 CFR 21.11 (d)(1). The option of formal mediation meeting(s) between the affected parties may be utilized for resolution at any stage of the process. The investigator will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Any person who feels that he or she has been subjected to discrimination on the basis of race, color, national origin, sex, age, or disability has the right to file a complaint with the Iowa DOT's Civil Rights Bureau. Title VI complaints must be filed within 180 days of the alleged discriminatory event or practice. Complaints must be filed in person or in writing. They should be directed to:

Iowa Department of Transportation
Civil Rights Bureau
800 Lincoln Way
Ames, Iowa 50010
(515) 239-1304
Civil.Rights@iowadot.us

Roles and Responsibilities

The Administrative Services Division Director, Civil Rights Bureau Director, External Civil Rights Administrator and EEO Officer/ADA Coordinator have overall responsibility for the discrimination complaint process and procedures.

The Administrative Services Division Director, Civil Rights Bureau Director, External Civil Rights Administrator, EEO Officer/ADA Coordinator, Civil Rights Compliance Officers and Civil Rights Committee Members serve as points of contact statewide for the public to initiate complaints of discrimination.

The Civil Rights Bureau Director, External Civil Rights Administrator, EEO Officer/ADA Coordinator and/or Civil Rights Compliance Officers are responsible for conducting an impartial and objective investigation, collecting information, and preparing a fact-finding report based upon the information obtained from the investigation. In cases where the complainant is unable or incapable of providing a written statement, the complainant will be assisted in converting the verbal complaint into a written complaint. All complaints, however, must be signed by the complainant.

Filing of Formal Complaints

APPLICABILITY

The complaint procedures apply to the beneficiaries of the Iowa DOT's programs, activities, and services, including but not limited to the public

and other sub-recipients of Federal transportation funds.

ELIGIBILITY

Any person who believes that he/she has been excluded from participation in or denied benefits or services of any program or activity administered by the Iowa DOT or its sub-recipients, consultants, and contractors on the basis of race, color, national origin, sex, age, or disability may bring forth a discrimination complaint under Title VI, Title II and related statutes.

TIME LIMITATIONS AND FILING OPTIONS

Title VI complaints of discrimination may be filed with:

- The Iowa DOT – Civil Rights Bureau
- Federal Highway Administration
- Federal Transit Administration
- Federal Motor Carrier Safety Administration
- Iowa Office of Civil Rights
- Federal Motor Carrier Safety Administration
- U.S. Department of Justice
- U.S. Department of Transportation

In all situations, Iowa Department of Transportation Civil Rights Bureau staff must immediately forward Title VI discrimination complaints to either the FHWA or the FTA.

Complaints must be filed no later than 180 days after:

- The date of the alleged act of discrimination; or
- The date when the person(s) became aware of the alleged discrimination; or
- The date on which conduct was discontinued if there's been a continuing course of conduct.

TYPE OF COMPLAINTS

Protected Group Categories	**Definition**	**Examples**
Race	An individual belonging to one of the accepted anthropological racial groups; or the perception, based on physical characteristics, that a person is a member of a racial group.	Black or African-American, White, Hispanic, Asian, Native American Indian, Alaska Native, Native Hawaiian or Other Pacific Islander
Color	Color of skin, including shade of skin within a racial group.	Black, white, light brown, dark brown, etc.
National Origin	National birth site. Citizenship is not a factor. Discrimination based on language or person's accent is covered by national origin.	Mexican, Cuban, Japanese, Vietnamese, Chinese
Sex	Male or Female	Women and men
Age	Persons of any age	21-year-old person
Disability	Physical or mental impairment, permanent or temporary or perceived.	Visual impairment, hearing impairment, mobility limitations

All Title VI and related statute complaints are considered formal as there is no informal process. Complaints must be in writing and signed by the complainant. Complaints must include the complainant's name, address and phone number and must be sufficiently detailed to specify all issues and circumstances of the alleged discrimination.

COMPLAINT BASIS

Allegations must be based on issues involving race, color, national origin, sex, age, or disability. The term “basis” refers to the complainant’s protected group status.

Complaint Procedures

1. INITIAL CONTACT

The Administrative Services Division Administrator, Civil Rights Bureau Director, External Civil Rights Administrator, EEO Officer/ADA Coordinator, Title VI Specialists, and Civil Rights Committee members will provide complainants with:

- An explanation of their filing options;
- The discrimination complaint procedures;
- The Title VI Discrimination Complaint Form (107009); or
- Title II Discrimination Complaint Form (131103);
- The brochures, titled “Title VI and You” and/or “Title VI sub-recipient guide to implementing Title VI of the Civil Rights Act of 1964.”

2. THE COMPLAINT REVIEW PROCESS – Title VI

The Civil Rights Bureau Director reviews the complaint upon receipt to ensure that relevant information is provided, the complaint is timely and is appropriate for investigation.

If the complaint is not appropriate for investigation, the complainant will be notified in writing and is provided with his/her rights under Title VI.

A. The complaint shall be investigated unless:

   a. The complaint is withdrawn;
   b. The complainant fails to provide required information after numerous requests;
   c. The complaint is not timely filed;
   d. Any issues that do not involve discrimination, or are not based on a protected category, will be directed to the appropriate entity. Under no circumstances is the complainant to be discouraged from filing a complaint.

B. Upon determination that the complaint warrants an investigation:
   The complainant is sent a letter, acknowledging receipt of the complaint, the name of the investigator, and is provided with his/her rights under Title VI and related statutes.

C. The respondent is notified by mail that he/she has been named in a complaint and is provided with his/her rights under Title VI and related statutes. The letter also reveals the investigator’s name and informs the respondent that he/she will be contacted for an interview.

D. Correspondence is sent to the appropriate District Engineer, Divisional, or

Bureau Director notifying them that a complaint was filed and will list the names of the parties involved, the basis of the complaint and the assigned investigator.

E. The Civil Rights Bureau Director is responsible for the overall Title VI program implementation. The Civil Rights Bureau Director is appointed by the Administrative Services Division Director who reports directly to the Chief Operating Officer who reports to the Director of the Iowa DOT.

Investigation Process

1. INVESTIGATION PLAN

The investigator shall prepare a written plan which includes but not limited to the following:

- Names of the complainant(s) and respondent(s);
- Basis for the complaint;
- Issues, events or circumstances that caused the person to believe that he/she has been discriminated against;
- Information needed to address the issue;
- Sources necessary to obtain the information;
- Identification of key people;
- Estimated investigation time line;
- Remedy sought by complainant(s)

2. CONDUCTING THE INVESTIGATION

A. The investigation shall address only those issues relevant to the allegations in the complaint.

B. Confidentiality shall be maintained.

C. Interviews will be conducted to obtain facts and evidence regarding the allegations in the complaint.

D. Interviews may be tape recorded with the interviewee’s consent.

E. A chronological contact sheet is maintained in the case file throughout the investigation.

3. INVESTIGATION REPORTING PROGRESS – Title VI

A. Within 40 days of receiving the complaint, the investigator prepares an Investigative Report and submits the report and supporting documentation to the Civil Rights Bureau Director for review.

B. The Civil Rights Bureau Director reviews the file and investigative report. After the review, the Civil Rights Bureau Director makes a recommendation and

prepares a final decision letter for review and signature.

C. The Civil Rights Bureau Director shall prepare and submit a written report outlining the following complaint details:
    a. Date of written complaint;
    b. Complaint basis (race, color, national origin, etc.);
    c. Complaint disposition.
D. The Civil Rights Bureau maintains a master complaint log.

Reporting Requirements

A copy of the complaint, together with a copy of the report of investigation, is forwarded to the appropriate federal agency within 60 days of the date the complaint was received.

Records

All records and investigative working files are maintained in a confidential area within the Civil Rights Bureau. Records will be kept for three years internally then archived for a period of ten years.

Complaint Process Flow Chart

