FFY 2026
Title VI/Nondiscrimination Plan
Ensuring Justice

October 1, 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.

Title VI does not only apply to the discrete program or activity to which a recipient directs federal funds. Congress clarified its intent regarding the broad coverage of Title VI and related civil rights laws with the Civil Rights Restoration Act of 1987. That Act amended Title VI to say that "programs" or "programs and activities" means "all of the operations of" any department, agency, or instrumentality of a state or local government, any part of which is extended federal assistance. To be clear, if a department of a state or local government receives federal assistance, all the operations of that department would be covered by Title VI, but not all of the operations of the State or local government. The amended definition of "programs and activities" also makes clear that Title VI does not only apply to activities of a recipient of federal assistance that are federally funded but applies to "all the operations of" a recipient, even those that are not federally funded. Title VI also applies to the programs and activities of entities that distribute federal funds to other entities (called "subrecipients") as well as those actions taken by private firms under contract with the recipient. Taken together, this means that the scope of Title VI is quite expansive.

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 apply the intent of Title VI of the Civil Rights Act of 1964 in performing assigned duties.

The Federal Highway Administration (FHWA) requires recipients of Federal-Aid Funds to prepare a plan to clarify roles, responsibilities, and procedures established to ensure compliance with Title VI of the Civil Rights Act of 1964.

The Iowa DOT's Title VI 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 prohibits discrimination on the basis of race, color, or national origin in programs and activities of any entity that receive federal assistance. The law provides that: "[n]o person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal assistance." 42 U.S.C. § 2000d. Entities, whether public or private, that receive federal assistance (called recipients) from any federal agency, including

the Federal Highway Administration (FHWA), must take concrete steps to ensure nondiscrimination in their programs and activities.

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.

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
- Uniform Relocation Assistance and Real Property Acquisition 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
- Title VII of the Civil Rights Act 1968, 42 U.S.C. §§ 3601-3631

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.

The Iowa DOT also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities. In addition, 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 serves as the Title VI Coordinator and is responsible for initiating and monitoring Title VI & Nondiscrimination activities, preparing reports and performing other responsibilities, as required by 23 C.F.R. § 200 and 49 C.F.R. § 21.



Scott Marler, Director

10/7/2026

Date

Standard Assurances
49 C.F.R. § 21.7

Pursuant to 49 C.F.R. § 21.7, every application for federal financial assistance or continuing federal financial assistance must provide a statement of assurance and give reasonable guarantee that the program is (or, in the case of a new program, will be) conducted in compliance with all requirements imposed by or pursuant to Part 21 (Nondiscrimination in Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964). Fully executed standard DOT assurances (including Appendices A, B, C, D and E) are attached to this plan. (Attachment A)

SECTION 2 ORGANIZATION AND STAFFING

Organizational Chart

Iowa DOT's Title VI/Nondiscrimination Program has been established in accordance with federal rules under 23 CFR Part 200 and falls within the scope of responsibilities of the Civil Rights Bureau (hereafter referred to as "CRB"). CRB, located in Ames, serves as a central resource for Iowa DOT Districts, Bureaus, Divisions, its sub-recipients and the public.

The Iowa DOT's organizational chart (Attachment B), showing the Civil Rights Bureau, as of September 2026, is also found here: September 2026 DOT Organizational Chart. The CRB's organizational chart is Attachment C.

Staffing

The responsibility for the direction and implementation of the Iowa DOT's Title VI Program is assigned to the Director of the Iowa DOT.

The Civil Rights Bureau Director (hereafter referred to as "Bureau Director"), on behalf of the Iowa DOT Director, is responsible for the department-wide management of the Title VI program and the Civil Rights Bureau (hereafter referred to as "CRB") and has direct access to the Iowa DOT's Director on Title VI/Nondiscrimination issues. The Bureau Director is under the direct supervision of the Administrative Services Division Director, who reports to the Chief Operating Officer, who reports to the DOT Director.

Civil Rights Bureau Director Responsibilities

The Bureau Director is responsible for implementing, monitoring, and ensuring Iowa DOT compliance with Title VI regulations. The Title VI responsibilities are as follows:

- Oversees the daily operations of the Civil Rights Bureau
- Consult with and inform the Director and Administrative Services Division Director of the Iowa DOT on nondiscrimination program activities.
- Process the disposition of Title VI complaints received by the Iowa DOT, with assistance from Civil Rights Committee members/liaisons.
- Collect statistical data (race, color, sex, and national origin) of participants in, and beneficiaries of state highway and enforcement programs.
- Review Environmental Impact Statements for Title VI compliance
- Conduct Title VI reviews of cities, counties, consultants, contractors, universities, colleges, planning agencies, and other recipients of federal transportation funds.
- Review state program directives in coordination with Civil Rights Committee liaisons for special emphasis program areas and, where applicable, include Title VI language and related requirements.
- Conduct training programs on Title VI and related statutes for state program officers, civil rights officials, and Iowa DOT sub-recipients of federal funds.

EEO Officer & ADA Coordinator

The internal Equal Employment Opportunity (EEO), Officer and ADA Coordinator, under the direct supervision of the Civil Rights Bureau Director is responsible for functional administration of Iowa DOT's EEO Program and ADA compliance under Title I and II. Duties include:

- Administer and implement DOTs internal equal employment opportunity (EEO) program (delegated by the DOT Director) to ensure fair and equal treatment of persons regardless of race, color, religion, national origin, sex, age, and disability in all employment practices.
- Investigate complaints of discrimination under Title VII of the Civil Rights Act filed with state and federal enforcement agencies (e.g. Civil Rights Commission, Equal Employment Opportunity Commission, and city human rights commissions across the state.
- Serve as liaison between the department and enforcement agencies.
- Advise DOT management on resolutions to the complaints.
- Maintain accurate records and report investigations annually to federal highway administration through the annual plan and report.
- Administer DOT's Request for Reasonable Accommodation (RRA) process.
- Coordinate Title I responsibilities under the ADA which requires an employer to provide reasonable accommodation to qualified individuals with disabilities who are employees or applicants for employment.
- Serve as lead resource for accessibility and disability nondiscrimination regulations under ADA Title II and Section 504. This includes complaint and grievance procedures, general non-discrimination and notices to the public, facility accessibility and program accessibility, ADA transition plan and effective communication with all individuals (vision, hearing and/or speech disabilities require particular attention).
- Log, track and investigate external civil rights complaints (Title II, ADA and 504) as assigned.

External Civil Rights Administrator Responsibilities

The External Civil Rights Administrator, under the direct supervision of the Civil Rights Bureau Director is responsible for ensuring the Iowa DOT's compliance with the federal Civil Rights programs that highway contractors, consultants and sub-recipients must comply with. The Title VI responsibilities are as follows:

- Log, track and investigate external civil rights complaints (Title VI, Title II, ADA and 504) as assigned.
- Implement the Title VI/Nondiscrimination Plan.
- Implement the Disadvantaged Business Enterprise (DBE) Program on USDOT-assisted contracts and procurements.
- Setting annual overall DBE goals and DBE goals on individual projects in coordination with internal Iowa DOT divisions.

- Implement the Equal Employment Opportunity (EEO) Contract Compliance Program.
- Implement the On-the-Job Training (OJT) programs under the Training Special Provisions (TSP) of USDOT-assisted construction contracts.
- Establish and monitor the DBE, and Small Business Development Contracts (SBDC) Supportive Services Programs.
- Ensure proper DBE and SBDC Certification processes and documents are utilized.
- Provide training and technical assistance to the Iowa DOT and its sub-recipients, contractors and consultants.
- Monitor the Targeted Small Business program on state-funded contracts and procurements

Civil Rights Compliance Officers' Responsibilities

The Civil Rights Compliance Officers, under the direct supervision of the CRB Director, work in collaboration with the Civil Rights Bureau Director and External Civil Rights Administrator. They are responsible for preparing reports, coordinating and providing technical assistance on all Title VI/Nondiscrimination and Title II Programs. Duties include:

- Conducting internal Title VI reviews of Iowa DOT Program Bureau activities when necessary to cover areas beyond those included in routine monitoring.
- Participating with program area staff to review section program activities that include Title VI/Nondiscrimination issues.
- Conducting Title VI/Nondiscrimination reviews of consultants, contractors, suppliers, colleges/universities, regional planning affiliations (RPAs) and other sub-recipients of federal financial assistance to ensure Title VI compliance.
- Review Iowa DOT program manuals, contracts, and policy statements to determine whether Title VI is appropriately addressed.
- Working with program areas to correct identified Title VI/Nondiscrimination issues including discriminatory practices or policies.
- Developing Title VI/Nondiscrimination information for dissemination to the public and, where appropriate in languages other than English.
- Conduct Title VI training for Civil Rights Committee Liaisons, Iowa DOT staff and subrecipients.
- Assist in the preparation of annual reports of Title VI activities and accomplishments.
- Assist in updating the Title VI/Nondiscrimination Plan as necessary to reflect organizational, policy or implementation changes.

Civil Rights Liaison (Committee)

Each of the Iowa DOT Bureaus listed in the chart on the next page shall have a designated Civil Rights Committee Liaison. These key programs or department areas are subject to receiving federal assistance through grants or other types of transportation-related funding and are responsible for implementing Iowa DOT directives and policies to ensure civil rights compliance and equal opportunity within their respective program/area including:

Civil Rights Committee Liaison – Bureau Representatives

Wilson, Tyler
Local Systems
Tyler.Wilson@iowadot.us
515-744-8778

Maifield, Deanna
Project Management
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Wingert, Jamie
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515-239-1806

Wright, Shane
Aviation Transit
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515-39-1048

Day, Carrera
Operational Services
Dayana.Carrera@iowadot.us
515-239-1929

Bailiff, Tami
Right of Way
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515-233-7867

Dunn, Mark
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Mark.Dunn@iowadot.us
515-239-1414

Ebel, Shelby
District 1
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515-239-1318

Scott Nixon
Construction & Materials
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515-239-1843

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District 2
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515-239-1318

Breitbach, Donna
Location and Environment
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515-239-1787

Brewer, Valerie
Location and Environment
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515-239-1447

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Systems Planning
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515-233-7733

Holst, Jason
Design
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515-239-1856

Brousard, Julie
Human Resources Bureau
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515-239-1594

Pinegar, Angela
Motor Vehicle Division
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Murray, Rick
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515-237-3325

Tracy, Sarah
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515-239-1318

Kukla, Christopher
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Suhr, Scott
District 4
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712-243-7627

Torres-cacho, Hector
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515-239-1807

Cogdill, Todd
Maintenance
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515-239-1547

Iowa DOT Civil Rights Bureau Staff Members

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Civil Rights Bureau Director
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515-239-1304

Bradley, Tracey
Civil Rights Compliance Officer
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515-239-1833

Kerber, Steve
Civil Rights Compliance Officer
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515-239-1483

Smith, Spenser
DBE Compliance Auditor
Spenser.Smith@iowadot.us
515-239-1328

Upton, Diana
External Civil Rights Administrator
Diana.Upton@iowadot.us
515-239-1427

Wagener, Danny
DBE Compliance Auditor

danny.wagener@iowadot.us
515-239-1422

Weerheim, Amy
EEO Officer & ADA Coordinator
Amy.Weerheim@iowadot.us
515-689-1009

Federal Highway Administration Civil Rights Liaison

Gibson, Johnnie
FHWA – Iowa Division
Johnnie.Gibson@dot.us
515-233-7322

Committee Organization

The CRB and Civil Rights Committee members have the primary responsibility of implementing civil rights and nondiscrimination programs within the Iowa DOT. The Civil Rights Committee members have been selected based on their technical expertise in each of their program areas/bureaus. All members are expected to contribute and participate.

Responsibilities of the Civil Rights Committee

Members will provide support, coordination, input and information on the processes, procedures and operations of their areas of expertise to ensure the best possible decision making in the development and completion of compliance reviews.

- Members will devote the time and thought necessary to provide valuable guidance and input to the lead reviewer and work effectively to help reconcile issues or areas of concern. This requires responding to requests from the Lead Reviewer by a specified due date.

- Members will provide research, analysis and recommendations to enhance the effectiveness of the compliance reviews, such as developing review instruments, interview questions and ongoing efficiencies (continuous process improvements).

- The Committee will meet on a quarterly basis. The Committee will be co-chaired by the CRB External Civil Rights Administrator.

SECTION 3 IMPLEMENTATION PROCEDURES

Complaints

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, and national, he/she may file a complaint with the Iowa DOT. Complaints will be logged and forwarded to the FHWA-Iowa Division office.

If the complaint is returned to the Iowa DOT for investigation, an investigation file will be created and will contain, at minimum: copy of the complaint, investigative plan, investigation report, investigative findings, recommendations, and remedial action taken The Iowa DOT's Discrimination Complaint process is further described in Attachment D.

Data Collection

Statistical data on race, color, national origin, age, disability, income level, language spoken, and sex of participants in, and beneficiaries of, Iowa DOT programs, e.g., relocation, impacted citizens, and affected communities, will be gathered and maintained by the CRB for the Iowa DOT. Each of the Title VI program areas will maintain data to be incorporated in the Title VI/Nondiscrimination Annual Accomplishments and Goals Report. The data gathering process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI/Nondiscrimination program administration.

Iowa DOT Internal Title VI Program Reviews

The CRB will annually review its program areas, divisions, bureaus and districts to assess Iowa DOT administrative procedures and processes, staffing and resources available for Title VI/Nondiscrimination compliance. On an annual basis, the Title VI/Nondiscrimination Accomplishments and Goals report will be reviewed to ensure it contains the necessary information to evaluate the Iowa DOT Title VI/Nondiscrimination program as it pertains to its accomplishments, shortfalls, and problem areas.

The Civil Rights Compliance Officers will conduct one or more internal Program Area reviews annually. These Program Reviews focus more in-depth on a specific Federal Program Area. The following criteria may be used in selecting the program areas and bureaus for review:

Concerns or questions regarding Title VI complaints, history of deficiencies or observations during review of the Title VI/Nondiscrimination Accomplishment and Goals report. Program areas scheduled for review will be notified in writing at least 60 days in advance to coordinate a date to ensure the attendance of key personnel. The notification will include a compliance review instrument containing questions that program areas, bureaus, or districts are required to answer in writing and return within 30 days of receipt.

The CRB will review the responses to the compliance review instrument during the desk review process in advance of the on-site review. The program review will consist of a desk audit, review of files and documentation, in-person conference and interviews.

A compliance review report (findings) will be issued within 30 days following the in-person conference. A copy of the report is provided to the Bureau Director/District Engineer and appropriate staff members and FHWA. If the CRB determines that the program area is in compliance, no action will be required. If the CRB determines that the program area has deficiencies, CRB with the assistance of the program area will develop a Corrective Action Plan (CAP) to overcome any findings within a period not to exceed 90 days.

Corrective Action

Effective compliance with Federal regulations requires the Iowa DOT to take corrective action to resolve Title VI/Nondiscrimination deficiencies. The CRB will seek the cooperation of the program area and/or bureau in correcting deficiencies found during the review. If an Iowa DOT program area, and/or bureau is found to have deficiencies, the program area and/or bureau, with the assistance of the CRB, will write a corrective action plan to be implemented within a reasonable time period not to exceed 90 days.

The CRB will also provide technical assistance and guidance as needed to aid the program area and/or bureau. Efforts to resolve deficiencies found at the outset of the review will be pursued throughout the compliance review process.

Self-Monitoring

Self-monitoring requires program areas and bureaus to track, regulate and observe their processes to ensure compliance with Title VI/Nondiscrimination.

Documentation is a critical element of the compliance monitoring process. It is relied upon to provide evidence, proof and support of historical facts during monitoring and compliance review activities. Policy decisions, procedures, analysis, actions, and outcomes should be documented as part of the program area staff's daily routine.

Title VI Reviews of Sub-recipients

It is the responsibility of the CRB to conduct compliance reviews of its sub-recipients of federal financial assistance, including local public agencies (LPAs) and regional planning affiliations (RPAs). The CRB conducts compliance reviews to:

1. Ensure compliance with Title VI

2. Provide technical assistance in the implementation of the Title VI program

3. Correct deficiencies, when found to exist

The Title VI/Nondiscrimination review process focuses on, but is not limited to, compliance with 10 major components of Title VI. The 10 components are defined in IM 1.070 http://www.iowadot.gov/local_systems/publications/im/1070.pdf

i. Developing Title VI Assurances
ii. Developing a Title VI Policy Statement

iii. Identifying a Title VI Coordinator or Civil Rights Liaison
iv. Developing procedures for processing external discrimination complaints
v. Providing the Iowa DOT with a list of external discrimination complaints
vi. Providing accommodations for limited English proficient (LEP) persons
vii. Ensuring nondiscrimination in the LPA's public participation process
viii. Collecting and analyzing data to ensure nondiscrimination in the LPA's programs and activities
ix. Ensuring that contracts contain the appropriate Title VI contract provisions
x. Ensuring nondiscrimination in the award of contracts

All sub-recipients of the Iowa DOT are subject to review.

The CRB will perform desk and onsite compliance reviews on selected sub-recipients.

The CRB will complete a compliance review report on each LPA and retain the report for a 5-year period. The CRB will send a copy of the report to FHWA – Iowa Division to for both review and monitoring purposes.

The CRB will review RPAs each year. The review process is established by the Systems Planning Bureau and shall follow the schedule and selection of RPAs established by said bureau.

The CRB shall utilize a weighted random sample from the pool of all Iowa LPAs that have received federal funding in the selection of reviews to be performed on those sub-recipients except for RPAs. Selected LPAs will be notified in writing at least 60 days in advance that they have been selected for compliance review to coordinate a date to ensure the attendance of key personnel. The notification will include a Title VI/Nondiscrimination compliance site review tool containing questions that sub-recipients are required to answer in writing and return 30 days after receipt.

The CRB Civil Rights Compliance Officers will review the documents and information submitted by the sub-recipient. A compliance review report will be issued within 30 days following the onsite review. A copy of the report is provided to the sub-recipient and FHWA-Iowa Division. No action on the part of the sub-recipient is required on findings of compliance unless a condition of compliance is specified. If the review contains deficiencies, the subrecipient, with the assistance of the Civil Rights Compliance Officers, will be required to develop a Corrective Action Plan (CAP) to overcome any deficiencies within a period not to exceed 90 days. The CRB Civil Rights Compliance Officers will prepare a report of findings which may include recommendations to strengthen the LPA's or RPA's Title VI/Nondiscrimination program.

The Iowa DOT will actively pursue the prevention of Title VI/Nondiscrimination deficiencies and violations and will take the necessary steps to ensure compliance with all program's administrative requirements, both within the Iowa DOT and with its sub-recipients of federal highway funds. When irregularities occur in the administration of the federal-aid highway program's operation, corrective action will be taken to resolve Title VI/Nondiscrimination issues.

The sub-recipient will submit a corrective action plan agreed upon by the sub-recipient and Iowa DOT to be implemented within a period not to exceed 90 days.

The Iowa DOT will seek the cooperation of the sub-recipient in correcting deficiencies found during the review. The Iowa DOT will also provide the technical assistance and guidance needed to aid the sub-recipient to comply voluntarily.

When a sub-recipient fails or refuses to voluntarily comply with requirements within the time frame allotted, the Iowa DOT will submit to the FHWA – Iowa Division copies of the case file and a recommendation that the sub-recipient be found in non-compliance.

Follow-up Monitoring

The CRB will determine if additional monitoring is needed to obtain compliant status and to ensure ongoing compliance with Title VI requirements.

Follow-up reviews may be conducted to ensure the sub-recipient has complied with the Title VI/Nondiscrimination Program requirements in correcting deficiencies previously identified. If the sub-recipient refuses to comply, the Iowa DOT may, with FHWA's concurrence, initiate sanctions per 49 CFR § 21.13.

Training Programs

Title VI/Nondiscrimination training is made available to contractors upon request. Sub-recipients are provided Title VI/Nondiscrimination training during their onsite reviews, through professional organizations and upon request. Iowa DOT program areas and employees receive Title VI training via participation on the Civil Rights Liaison Committee, via roundtable training and discussions, and New Employee Orientation. Training is always available upon request. The training will provide information on Title VI/Nondiscrimination, its application to program operations and identification of Title VI/Nondiscrimination issues. A summary of training conducted will be reported in the annual Accomplishments & Goals Report.

Annual Accomplishments and Goals Report

The purpose of the Annual Accomplishments and Goal Report is to summarize Title VI accomplishments achieved during the year, identify changes to the program occurring during the preceding year and determine the goals and objectives for the upcoming year. This report will be submitted to FHWA on or before October 1st of each year. Annual reports will be required for each program area. The Civil Rights Coordinator or designee will be responsible for both the coordination and preparation of the report.

Title VI Plan Update

The CRB will review and update the Iowa DOT Title VI Plan as needed or required, present the updated plan to the Iowa DOT management team for approval and submit the final draft of the updated plan to FHWA.

Language Accessibility Plan

The Iowa DOT makes every effort to provide meaningful access to its programs, activities and services 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.

Public Dissemination

The CRB will work with Iowa DOT staff to develop and disseminate Title VI/Nondiscrimination Program information to Iowa DOT employees, sub-recipients, contractors, consultants, and beneficiaries as well as the public. Public dissemination may include postings of policy statements, inclusion of Title VI/Nondiscrimination language in contracts or other agreements, website postings and annually publishing the Title VI/Nondiscrimination Policy Statement in newspapers having a general circulation and informational brochures. Iowa DOT will ensure that public service announcements or notices are posted for proposed projects, hearings, meetings, or formation of public advisory boards in newspapers or other media outlets in the affected community. Ensure the full utilization of available minority publications or media, and where appropriate, provide written information in languages other than English.

Post-Grant Reviews

Post-grant Title VI/Nondiscrimination compliance reviews will be conducted annually on contractors seeking contracts with the Iowa DOT. The reviews will determine compliance with Title VI/Nondiscrimination contractual provisions. Pre-grant reviews will be conducted on those sub-recipients that will be receiving Iowa DOT federal funds. The following procedures for pre-grant compliance apply to all sub-recipients of DOT funds. The sub-recipient is required to develop and execute a Title VI/ Nondiscrimination Agreement or Title VI/Nondiscrimination Plan and the associated Standard DOT Title VI Assurances. They are to provide a copy of these documents to the Iowa DOT and include the appropriate Appendices of the Standard DOT Title VI Assurances in all contracts, agreements, deeds, and permits associated with transportation projects or programs. Program area managers assist in ensuring a signed Standard DOT Title VI Assurance is on file before executing a federal funding agreement with a sub-recipient. The Iowa DOT will not process any new federal-aid funding agreements with a sub-recipient until Iowa DOT receives a copy of a signed Standard DOT Title VI Assurances and a Title VI/Nondiscrimination Agreement or Plan.

Post-grant reviews are conducted on those sub-recipients that have already received Iowa DOT federal funds. The procedure for sub-recipient post-grant reviews is under section 3. *Title* VI *Reviews of Sub-Recipients* of this document.

Remedial Action

The Iowa DOT will actively pursue the prevention of Title VI/Nondiscrimination deficiencies and violations and will take the necessary steps to ensure compliance with all program's administrative requirements, both within the Iowa DOT and with its sub-recipients of federal highway funds. When irregularities occur in the administration of the federal-aid highway program's operation, corrective action will be taken to resolve Title VI/Nondiscrimination issues.

If a corrective action plan is necessary, the Iowa DOT will prepare an action plan agreed upon by the Iowa DOT and FHWA-Iowa within a period not to exceed 90 days. The Iowa DOT will seek the cooperation of sub-recipients in correcting deficiencies found during their reviews. The Iowa DOT will also provide the technical assistance and guidance needed to aid the sub-recipient to comply voluntarily.

Sub-recipients placed in a deficiency status will be given a reasonable amount of time, not to exceed 90 days after receipt of the deficiency letter, to voluntarily correct deficiencies.

When a sub-recipient fails or refuses to voluntarily comply with requirements within the time frame allotted, the Iowa DOT will submit to the FHWA copies of the case file and a recommendation that the sub-recipient be found in non-compliance.

SECTION 4 PROGRAM ADMINISTRATION

Iowa DOT Bureaus

The Iowa DOT Bureaus shall ensure equitable enforcement of specifications and policies for all participants in and beneficiaries of Iowa DOT programs and activities, regardless of protected class.

Contracts and Specifications Bureau

The Contracts and Specifications Bureau is located within the Transportation Development Division and is responsible for conducting the lettings for the Iowa DOT highway construction projects as well as federally assisted highway projects for local jurisdictions.

Assurance Activities

- Include Required Contract Provisions (FHWA-1273) as it relates to letting and awarding of contracts.
- Ensure bidding and contract award procedures are consistent with nondiscrimination and EEO requirements.
- Ensure appropriate Appendices are included in all contracts let through the Contracts and Specifications Bureau.

Design Bureau

Technical design work and the preparation of plans used for the construction of highway improvements are the responsibility of the Design Bureau, and Bridges and Structures Bureau. These bureaus are located within the Transportation Development Division. These two bureaus also coordinate work in their areas that is done by outside consultants.

Assurance Activities

- Ensure that environmental justice considerations are addressed during route and project selection.
- Ensure full and fair participation of minority, low-income, elderly and disabled people in public involvement activities for project development activities.
- Demonstrate a consistent application of design standards to eliminate, minimize or mitigate adverse impacts among affected groups and to provide equitable levels of service to those groups.

Local Systems Bureau

The Local Systems Bureau, located within the Transportation Development Division, serves as a liaison for the Iowa DOT to the local governmental entities throughout the state providing

guidance and assistance in all phases of the highway project development process. This bureau also coordinates and provides support for developing project agreements with local jurisdictions.

Assurance Activities

- Support other Iowa DOT staff with implementation of Title VI/Nondiscrimination requirements with respect to local jurisdictions.

- Ensure that Title VI/Nondiscrimination requirements are properly addressed in policies, procedures, reference materials, and agreements that are produced for local jurisdictions.

Location and Environment Bureau

The Location and Environment Bureau, located within the Transportation Development Division, secures and reports environmental, cultural and related information necessary for decision-makers to approve the location of projects constructed by the Iowa DOT. They work with the districts, designers, and many outside agencies as well as consultants. They are responsible for preparing the environmental document for potential federal-aid projects and obtaining 404 permits for all projects that have wetland impacts.

The Location and Environment Bureau is also responsible for location and pre-location studies on large projects as well as coordinating and managing public involvement activities during the development phase.

Assurance Activities

- In collaboration with other bureaus during the selection of project alternatives, work to identify impacts to community and social impacts in the project and record these efforts in the environmental document.
- Make any necessary special accommodation for participants during project public involvement activities.

Right of Way Bureau

The Right of Way Bureau within the Transportation Development Division is responsible for securing the property required for highway construction. This includes identification of impacted properties, appraisal, acquisition and relocation assistance. They also manage and dispose of excess property. This work may be done with Iowa DOT staff or by consultants. This bureau also reviews the right-of-way processes of local jurisdictions.

Assurance Activities

- Make every reasonable effort to ensure clear communication when engaging in interactions with persons with LEP or are sight impaired or hearing impaired. This includes the use of interpreters when necessary.

- Through cooperation with other bureaus, identify low-income and minority populations and take steps to appropriately address disproportionately high adverse effects to their health and environment.

- Ensure equitable treatment of all affected property owners, regardless of race, color, or national origin. This includes, among other impacts, appraisal values, relocation assistance and opportunities for purchase of excess property.

- Provide opportunities for minority and female consultants.

- Monitor and review the right-of-way activities of cities and counties to verify compliance with Title VI in their right-of-way processes.

- Ensure applicable nondiscrimination language and appendices are included in contracts and agreements.

Project Management Bureau

The Project Management Bureau within the Transportation Development Division, in working with others, ensures completion of projects for letting in accordance with the Iowa Transportation Improvement Program (Five Year Program). The bureau administers the software that creates, schedules, and tracks individual projects and develops the 5 Year Program. They ensure that the schedules, budgets and scope of the projects align with the 5 Year Program and are updated as needed. The bureau also conducts the procurement and contracting of all consultant services in compliance with federal and state Qualification Based Selection regulations.

Assurance Activities

- Ensure consultant selections and contracting for engineering, architecture and related professional services are conducted in accordance with applicable federal and state regulations.

- Report on DBE usage for engineering, architecture and related professional services contracts.

Program Management Bureau

The Program Management Bureau within the Transportation Development Division, in working with other Iowa DOT bureaus, the districts and various state and local agencies, prepares the Iowa Transportation Improvement Program (Five Year Program) and the Statewide Transportation Improvement Program (STIP). They take 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. That is especially evident in project selection and programming.

Assurance Activities

- Take positive steps to encourage full and fair participation by all affected groups in development of the Five-Year Program and STIP.

- 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 and avoid disparate impacts from individual projects.

Systems Planning Bureau

The Systems Planning Bureau (SPB), within the Transportation Development Division, 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 Recreational Trails. SPB prepares both long- and short-range system plans through cooperation with other Iowa DOT bureaus and the districts, various state and local agencies, Metropolitan Planning Organizations, and Regional Planning Affiliations. These plans provide the framework for the Five-Year Program and STIP.

Title VI/Nondiscrimination must be considered throughout the planning process to ensure adequate public involvement and that potential impacts to the human environment are identified and addressed.

Assurance Activities

- Take positive steps to ensure full and fair participation in the planning process from minority, elderly, disabled, and low-income residents.

- Ensure that the project selection process functions so that minority, low-income, disabled, and elderly populations are not subject to disparate impacts from the individual projects. Avoid, minimize, or mitigate disproportionately high adverse impacts.

- Effectively consider both positive and negative effects of various transportation system alternatives on impacted groups.

- Review grant agreements to ensure required nondiscrimination language is included.

- Review grant selection criteria for inconsistencies.

Research and Analytics Bureau

The Research and Analytics Bureau, within the Transportation Development Division, facilitates the coordination and management of research activities for the department. They help identify research needs, develop and implement research and technology transfer programs. Work is done by and coordinated with many other agencies.

Assurance Activities

- Address DBE goals on consultant contracts,
- Encourage minority and female student participation on projects at universities.
- Include Title VI language in all research contracts.
- Consider utilization of Minority Institutes of Higher Education and Historically Black Colleges and Universities and report usage of these institutions.

- Conduct sub-recipient reviews of universities most frequently involved in research projects with the Iowa DOT;
- Establish goals for employment of minority and female students on university research projects;
- Include language in contracts requiring universities to demonstrate good faith efforts to employ minority and female faculty and students on Iowa DOT research projects; and
- Monitor contract compliance with respect to civil rights requirements.

Aviation Section

The Aviation Section within the Modal Transportation Bureau, under the Transportation Development Division, advocates for and delivers services that promote and enhance healthy air transportation system. Included in these activities are the administration of state-funded aviation programs and ranking and submitting pre-applications for federal improvement funds for general aviation airports in Iowa. The bureau is also the direct recipient of federal funds for statewide planning projects and installation of Automated Weather Observing Station units at local airports. The primary responsibility of the Aviation Bureau as it relates to Title VI/Nondiscrimination will be to ensure compliance in statewide contracts administered by the bureau and in contracts administered for locally owned airports.

Assurance Activities

- Review and update publications to ensure clear communication with persons with limited English proficiency.

- Assure that environmental justice and Title VI/Nondiscrimination impacts are addressed in airport improvement projects.

Public Transit Section

Transit services in Iowa are provided by 35 designated urban and regional public transit systems. The Public Transit Section, within the Modal Transportation Bureau, under the Transportation Development Division, administers federal and state transit funding programs and provides technical assistance to these public transit systems.

Since the department does not directly operate any transit systems, Title VI/Nondiscrimination responsibilities will be focused on monitoring the operations of the urban or regional transit agencies. It should be noted that urban transit systems serving areas with populations greater

than 50,000 engage directly with and are monitored by the Federal Transit Administration, although the Public Transit Section does provide guidance.

Construction and Materials Bureau

The Construction and Materials Bureau is located within the System Operations Division. The bureau is responsible for:

- Provide technical and administrative support to Iowa DOT and highway construction industries by assisting in the resolution of construction and materials issues. This includes consulting with District Construction Engineers, District Materials Engineers, project engineers and other Central Office staff regarding specifications, methods, techniques and policies of highway construction and materials, inspection and contract administration.

- Identify and communicate information on quality enhancement practices in highway construction

- Evaluate and support new technologies that enhance highway quality

- Provide education and training

- Facilitate the identification and implementation of improved safety practices for the public, inspectors and contractors on highway construction projects

- Provide statewide administrative support of the highway construction program

Assurance Activities

- Ensure consistent administration of testing and specifications regardless of race, color, or national origin. Do not discriminate in the approval of materials suppliers and sources.

- Encourage opportunities for females and minorities in research activities by external sources (consultants or universities).

Maintenance Bureau

The Maintenance Bureau, within the System Operations Division, working with the field maintenance, is responsible for maintenance activities along the primary and interstate roadways throughout the state. This includes snow removal, pavement and bridge maintenance, and vegetation control. Maintenance also administers the Adopt-A-Highway litter removal program as well as ensures applicable appendices of the Assurances are included.

Assurance Activities

- Provide appropriate level of service based on established policy and procedure regardless of the nature of the population being served by any roadway.

- Ensure that all people have an opportunity to participate in the Adopt-A-Highway program.

- Consistently administer the utility and access policies independent of the race, color or national origin of the applicant.

Districts

The districts are a critical component of the Field Operations Division system throughout the State of Iowa. They are involved with future transportation project selection and programming.

The districts take a lead role in project development starting with an initial project concept, continuing through the design and construction phases and then developing into an on-going maintenance commitment of the new project and the entire state highway system. As facilitators of highway development and maintenance, the districts make every effort to coordinate with local agencies, public, and private sector.

Assurance Activities

- With assistance from the CRB and other bureaus, districts will work to ensure that all people have a full opportunity to participate fairly in the development process. They will make special efforts to include low-income, minority, disabled, and elderly populations.

- Again, with the knowledge of local conditions and with assistance, they will take steps to ensure that minority, low-income, elderly and disabled people impacted by projects are identified and that disproportionate adverse impacts to their environment are avoided, minimized or mitigated.

- Document instances where Title VI issues were identified, and discrimination was prevented, or corrective action taken.

- Provide notice of public consultation forums in minority newspapers and newsletters when applicable and in languages other than English when needed.

- Administer transportation-related construction contracts on behalf of the State of Iowa in counties in Iowa.

- Work with CRB and other bureaus to ensure that all aspects of a project's location selection process comply with the Title VI nondiscrimination requirements.

- Make efforts to balance programmed projects so that all affected groups have an opportunity to benefit from the transportation system without disparate impacts.

Office of the Director

Created in early 2025, the Office of the Director (OTD) manages the department's External Communication functions and its Government & Legislative Relations activities. OTD handles several functions as it relates to its assurance activities.

Assurance Activities

External Communication

• The DOT Web team ensures agency compliance with the State of Iowa Web Accessibility Standard that adheres to the W3C WebContent Accessibility Guidelines 2.0. The overall goal is to make external websites and online documents accessible to the widest possible audience, including people with disabilities.

• External communication staff assists divisions to translate public information into various language translations as needed. This may include working with vendors to translate printed materials or host web-based information in other languages; assisting the Motor Vehicle Division to prepare, distribute, and host driver manuals; or support conduct of public meetings with translation available or primarily in non-English languages.

• The DOT Web team is also responsible to work with business units to post information to external and internal web pages supporting Civil Rights. This includes the Translation Assistance internal webpage and the Policy and Statements webpages.

• The team monitors comments on Iowa DOT social media accounts based on DOT policy. Comments may be manually removed if they are threatening, harassing, violent, promotes or perpetuates discrimination, in addition to a variety of other factors. Facebook automatically filters for profanity. Staff will also block or restrict access to users if their violation of the terms of use are deemed extreme or excessive.

• The team adds closed captions to all Iowa DOT videos published on the Iowa DOT YouTube channel. Auto captions are applied and then manually edited for accuracy.

• Receives and responds to individual constituent requests concerning Civil Rights issues that are forward through Congressional offices, Iowa legislators, and the Iowa Office of the Ombudsman. Any issues identified are reviewed with the DOT Civil Rights office, and OTD staff tracks and monitors responses.

• Government & Legislative Relations staff identifies any changes to federal, or state laws concerning Civil Rights and works with the appropriate business units to identify needed changes to Iowa state laws, administrative rules, or department policies & procedures to comply with the broader changes.

Government & Legislative Relations

- Iowa DOT receives and responds to individual constituent requests concerning Civil Rights issues that are forward through Congressional offices, Iowa legislators, and the

Iowa Office of the Ombudsman. Any issues identified will be reviewed with the DOT Civil Rights office, and OTD staff will track and monitor responses.

- The Government & Legislative Relations staff will identify any changes to federal or state laws concerning Civil Rights and work with the appropriate business units to identify needed changes to Iowa state laws, administrative rules, or department policies & procedures to comply with the broader changes.

Motor Vehicle Division

The Motor Vehicle Division (MVD) administers and enforces federal and state regulations governing vehicle titling and registration, vehicle operation, driver licensing, and legal identification. It manages driver's license (DL) and identification (ID) transactions for 2.6 million Iowa residents and oversees the registration of more than 4.6 million vehicles statewide. In addition, the MVD licenses and regulates various businesses, including vehicle dealers, third-party service providers, and driver educators.

The division manages a wide range of transactions and products, working with Iowa's 99 county treasurer offices to provide comprehensive services to residents and businesses statewide. It also partners with the American Association of Motor Vehicle Administrators (AAMVA) and the National Highway Traffic Safety Association (NHTSA) to follow national standards and guidelines for motor vehicle, driver's license, and identification services.

Organization

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

The Director's office oversees and guides all Division operations and services, legislative activities, legal compliance, as well as the MVD's finances and system-related projects and enhancements.

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, vehicle and dealer support, and motor carrier registrations, fuel taxes, and permits. The Service Delivery 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 & Partnerships Bureau (PPB) supports service delivery when transactions get complex. This bureau is comprised of our legislative compliance officers, Advanced Customer Experience and Vehicle Information Partners teams, as well as all our MVD Learning & Development, Driver Fitness, Driver's Education, and CDL Programming. This bureau provides training, guidance, policy updates, and resolves escalations to ensure smooth operations statewide.

The Bureau of Enforcements, Auditing, and Records (BEAR) safeguards accuracy, integrity, and compliance. Maintains records, conducts audits to prevent fraud, enforces policy, and protects data privacy. This bureau comprises several specialized teams: the

MVD Audit Team, which oversees transaction accuracy and compliance; the Motor Carrier Audit Team; and the MVD Records and Privacy Teams, which focus on data privacy compliance, auditing, and operational maintenance. Additionally, law enforcement officers and analysts conduct investigations into fraud and criminal activity related to vehicle titling and registration, driver license or identification products, vehicle dealer sales, and operations involving MVD and county staff. Such investigations may result in criminal charges or sanctions against individuals or businesses.

The Systems and Project Management Bureau (SPM) Manages systems and tools that power MVD operations. This bureau oversees and provides direct support of systems, vendors, and tools that power MVD operations and the support of multiple transactional systems and vendor relationships. SPM provides, maintains, and improves system access and governance for all MVD and county treasurer employees and manages all MVD equipment, inventory, supplies, and contracts.

Assurance Activities

- 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.

- SDB works with SPM 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, including interpretation devices and over-the-phone interpretative services.

- SDB facilitates in-person oral testing group sessions to meet LEP needs of local communities in Iowa.

- BEAR ensures all investigations and enforcement functions are carried out in equitable fashion.

- MVD works closely with AAMVA and other states to identify and address emerging issues and best practices regarding adherence to Civil Rights issues.

- PPB ensures all MVD customer resources and web pages are accessible works to translate materials to accommodate customers with limited English proficiency, including interpretative services.
- PPB updated the issuance onboarding workshop to include education on understanding and awareness of Civil Rights issues and how to deliver services and interact with customers. This includes discussion of serving unique customer groups as part of the CARE Customer Service initiative that is provided to all MVD and county treasurer staff.

- PPB hosts monthly workshops to educate driver's licensing staff on the immigrant and refugee experience to increase cultural awareness and customer sensitivity.

- MVD partners with the Des Moines Public Library to issue Identification cards to at risk and underserved individuals who may not have the capability to visit a service center.

- MVD partners with government and non-profit agencies in to provide driver and identity educational opportunities to foreign national customer populations.

Operational Services Bureau

The Operational Services Bureau (OSB) provides support across the agency through the strategic alignment of five teams: Customer Response, Procurement, Equipment Services, Architectural Services, and Facility Management. We are responsible for handling situations affecting Ames Complex, the bidding and contracting of goods and services used by Iowa DOT as specified in the DOT's internal Policy 010.10, the development and maintenance of the Facility and Equipment plans and programs and supporting statewide facility maintenance and repair.

Assurance Activities

- Ensure applicable nondiscrimination language and appendices are included in contracts and agreements.
- Providing multiple avenues for submitting building requests – in-person, phone, e-mail, teams, etc.
- Public notice of Title VI and Title VI resources on OSB bulletin boards.

Administration

In addition to the program bureaus described above, there are other administrative areas which have Title VI/Nondiscrimination implications. These include agency staff engaged in the development of policies, procedures and directives; other legal instruments and proposed legislation; dissemination of information to the public and public involvement programs.

Assurance Activities

- Monitor continued progress on agency-wide Title VI Accomplishments and 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/Nondiscrimination issues.

- Review contracts, agreements and other legal instruments for appropriate Title VI/Nondiscrimination language.

- The Title VI Coordinator and/or Civil Rights Compliance Officers may periodically conduct Title VI/ Nondiscrimination training for district engineers, division directors, and Civil Rights Committee members as well as the Iowa DOT sub-recipients.

- Ensure publications and other information disseminated to the public includes Title VI/ Nondiscrimination policy reference.

- Ensure public involvement activities allow for Title VI/Nondiscrimination requirements

Human Resources Bureau

The Human Resources Bureau oversees workforce recruitment and hiring, employee relations, benefits administration, classification and compensation, and health and safety programs. In carrying out these functions, Human Resources staff work closely with prospective and current employees, other state agencies, and external vendors and service providers. Human Resources staff ensure that all Human Resources functions and policies are administered in a nondiscriminatory manner and remain fully aligned with applicable federal and state civil right requirements and laws by ensuring equitable access to employment opportunities, benefits, and workplace resources.

Assurance Activities

- Maintains nondiscriminatory recruitment, hiring, promotion, and separation processes.
- Ensures Equal Employment Opportunity and nondiscrimination language is included on the job posting webpage and both external and internal websites
- Requires acknowledgment of the receipt of the most current State of Iowa Employee Handbook that contains the Anti-Discrimination Policy for the State of Iowa by all employees
- Ensures employee benefits, programs, and workplace resources are accessible and equitably provided.

SECTION 5 ATTACHMENTS

Attachment A Standard Assurances

The United States Department of Transportation (USDOT)
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 Highway Administration (FHWA)**, is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq*., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled *Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation—Effectuation Of Title VI Of The Civil Rights Act Of 1964*);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

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

General Assurances

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

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

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 Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted **Federal Highway Program**:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests for Proposals for work, or material subject to the Acts and the Regulations made in connection with all **Federal Highway Programs** 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, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.*"

3. 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, 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 **FHWA** 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 **FHWA**. You must keep records, reports, and submit the material for review upon request to **FHWA**, 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 U.S. Department of Transportation under the **Federal Highway 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 **Federal Highway 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: 10/7/2026

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 Highway Administration**, 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, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations set forth in Appendix E, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the **Federal Highway Administration** to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will certify to the Recipient or the **Federal Highway Administration**, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the **Federal Highway Administration** may determine to be appropriate, including, but not limited to:
    a. withholding payments to the contractor under the contract until the contractor complies; and/or
    b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions: The** contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the **Federal Highway Administration** may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B - CLAUSES FOR DEEDS TRANSFERING UNITED STATES PROPERTY

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 Iowa Department of Transportation will accept title to the lands and maintain the project constructed thereon in accordance with **Title 23, United States Code**, the Regulations for the Administration of **Federal Highway Program,** and the policies and procedures prescribed by the **Federal Highway Administration** 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 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 **Iowa Department of Transportation** 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 **Iowa Department of Transportation** 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 **Iowa Department of Transportation**, its successors and assigns.

The **Iowa Department of Transportation** 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, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [,] [and]* (2) that the **Iowa Department of Transportation** 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, 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.)

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

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the **Iowa Department of Transportation** pursuant to the provisions of Assurance 8(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 (equates to minority), 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, **Iowa Department of Transportation** 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 **Iowa Department of Transportation** 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 **Iowa Department of Transportation** 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 D - CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/ agreements entered into by **Iowa Department of Transportation** pursuant to the provisions of Assurance 8(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 (equates to minority), 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, or national origin, sex, age, disability, low-income, or LEP 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, **Iowa Department of Transportation** 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, **Iowa Department of Transportation** will there upon revert to and vest in and become the absolute property of **Iowa Department of Transportation** and its assigns.*

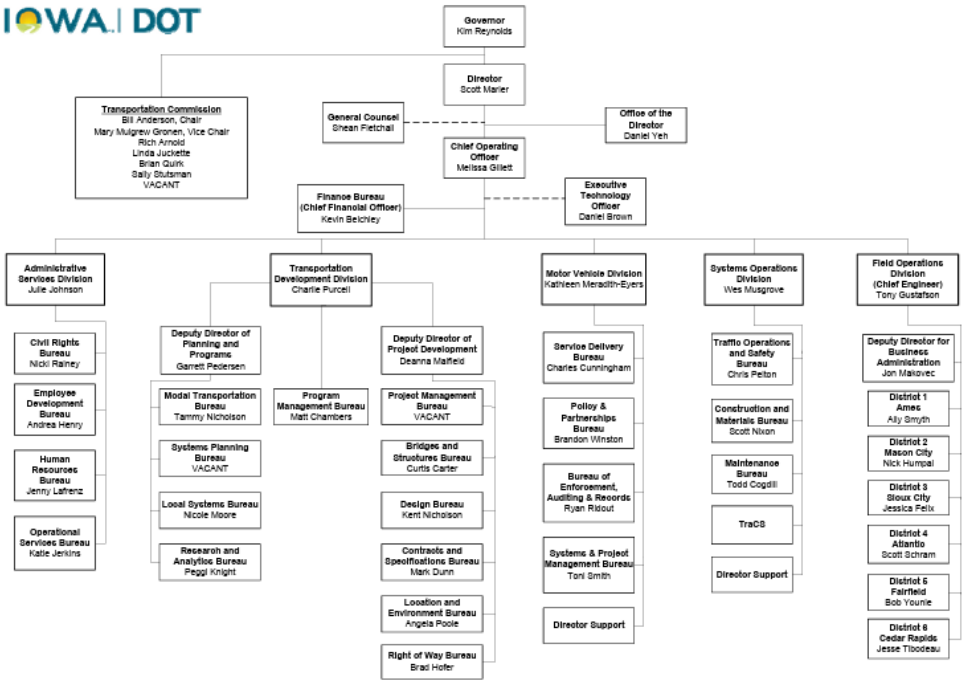
(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to effectuate the purpose of Title VI.)

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:

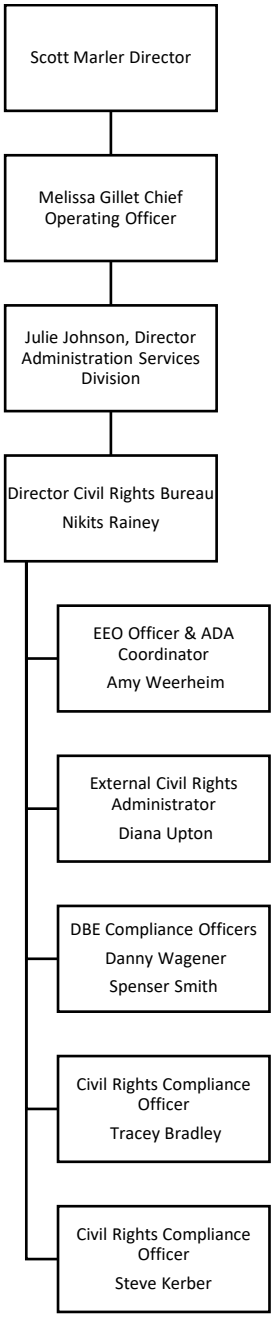
- Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. § 2000d *et seq*.), (prohibits discrimination on the basis of race, color, national origin), as implemented by 49 C.F.R. Part 21.1 *et seq*., including any amendments thereto, and 49 C.F.R. part 303;
- The Uniform Relocation Assistance 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 - Iowa DOT Organizational Chart



Iowa DOT's Organizational Chart as of September 2026.

Attachment C - Civil Rights Bureau Organization (September 2026)



Attachment D - Discrimination Complaint Process

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 by Title 49, CFR 21.11I.
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), 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, FHWA, 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, ADA Coordinator and External Civil Rights Administrator have overall responsibility for the discrimination complaint process and procedures.

- The Civil Rights Bureau Director, ADA Coordinator, External Civil Rights Administrator, 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, ADA Coordinator, External Civil Rights Administrator, 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
- U.S. Department of Transportation
- Iowa Labor Services Division
- Federal Motor Carrier Safety Administration
- U.S. Department of Justice

In all situations, Iowa Department of Transportation Civil Rights Bureau staff must immediately forward Title VI discrimination complaints to FMCSA, FHWA or 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, White, Hispanic, Asian, Native American Indian, Filipino, or 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 complaints' 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 Civil Rights Bureau Director, ADA Coordinator, External Civil Rights Administrator, Title VI Specialists, or 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);
   - The 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.

   A. 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.
   B. 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.
   C. 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.
   D. 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.

E. A letter is sent to the appropriate District Engineer, Divisional, or Bureau Director when the complainant(s) or respondent(s) are in their district or office. The letter will inform them that a complaint was filed and will list the names of the parties involved, the basis of the complaint and the assigned investigator.
F. The Civil Rights Bureau Director is responsible for the overall Title VI program implementation. The Civil Rights Bureau Director reports to the Administrative Division Director, who reports to the Chief Operating Officer, who reports directly 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 timeline;
- 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 Chief Operating Officer for review.
B. The Chief Operating Officer 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 for the Chief Operating Officer.

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 – Complaints filed with the Civil Rights Bureau

Step 1: Complaint filed with the Iowa DOT - Civil Rights Bureau is reviewed for issue clarification and/or investigation
Step 2: Letters sent to Complainant, Respondent, District Engineer or Bureau Director acknowledging receipt of complaint
Step 3: Civil Rights Bureau Director conducts the investigation and prepares an investigation report with recommendations for the Administrative Services Division Director's review
Step 4: The Administrative Services Division Director reviews the investigative report and makes a determination whether or not to support the recommendation
Step 5: The complainant is notified within 60 days of investigation results in a letter signed by the Administrative Services Division Director
Step 6: FMCSA or FTA is notified of the complaint and/or disposition

Complaint Process Flow Chart – Complaints filed with Districts/Program Offices

Step 1: Complaint filed in the District or Division Office
Step 2: Complaint is forwarded to the Civil Rights Bureau for issue clarification and/or investigation
Step 3: Letters sent to Complainant, Respondent, District Engineer or Bureau Director acknowledging receipt of complaint
Step 4: Civil Rights Bureau Director conducts the investigation and prepares an investigative report and recommendation for the District Engineer or Office Director

Step 5: The District Engineer or Bureau Director reviews the report, makes a determination whether or not to support the recommendation, and forwards to the Administrative Services Division Director
Step 6: The complainant is notified within 60 days of investigation results in a letter signed by the Administrative Services Division Director or Civil Rights Bureau Director
Step 7: FMCSA or FTA is notified of the complaint and/or disposition

DEFINITIONS

Complainant means the person or persons who have filed a Title VI complaint alleging discrimination by a Recipient.

Federal financial assistance **and** ***Federal aid*** **(49 CFR §21.23I)** includes:

(1) Grants and loans of Federal funds.

(2) The grant or donation of Federal property and interests in property.

(3) The detail of Federal personnel.

(4) The sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and

(5) Any Federal agreement, arrangement, or other contract which has as one of its purposes the provision of assistance.

Program or activity and program **(49 CFR §21.23I)** mean all of the operations of any of the following entities, any part of which is extended Federal financial assistance:

(1)(i) A department, agency, special purpose district, or other instrumentality of a State or of a local government; or

(ii) The entity of such State or local government that distributes such assistance and each such department or agency (and each other State or local government entity) to which the assistance is extended, in the case of assistance to a State or local government.

(2)(i) A college, university, or other post-secondary institution, or a public system of higher education; or

(ii) A local educational agency (as defined in 20 U.S.C. 7801), system of vocational education, or other school system.

(3)(i) An entire corporation, partnership, or other private organization, or an entire sole proprietorship—

(A) If assistance is extended to such corporation, partnership, private organization, or sole proprietorship as a whole; or

(B) Which is principally engaged in the business of providing education, health care, housing, social services, or parks and recreation; or

(ii) The entire plant or other comparable, geographically separate facility to which Federal financial assistance is extended, in the case of any other corporation, partnership, private organization, or sole proprietorship; or

(4) Any other entity which is established by two or more of the entities described above.

Recipient (**49 CFR §21.23(f))** means any State, territory, possession, the District of Columbia, or Puerto Rico, or any political subdivision thereof, or instrumentality thereof, any public or private agency, institution, or organization, or other entity, or any individual, in any State, territory, possession, the District of Columbia, or Puerto Rico, to whom Federal financial assistance is extended, directly or through another recipient, including any successor, assignee, or transferee thereof, but such term does not include any ultimate beneficiary.

Respondent means the Recipient against which a complaint of discrimination has been filed.