

INTRODUCTION

The purpose of this document is to ensure that transit services operated in the City of Coralville are in compliance with the FTA Circular 4707.1A and Title VI of the Civil Rights Act of 1964, which states:

“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 that receives Federal financial assistance.”

With specific regard to transit services, this document ensures that:

1. FTA assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin;
2. That the level and quality of FTA assisted transit services are sufficient to provide equal access and mobility for any person without regard to race, color, or national origin;
3. That opportunities to participate in the transit planning and decision-making processes are provided to persons without regard to race, color, or national origin;
4. That decisions on the location of transit services and facilities are made without regard to race, color, or national origin; and

That corrective and remedial action will be taken if necessary to prevent discriminatory treatment based on race, color, or national origin.

TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM

TITLE VI AUTHORITIES

Title VI of 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, nations origin be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance (23 CFR 200.9 and 49 CFR21).

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms “programs or activities” to include all programs and activities for Federal Aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 10-259 {S.557} March 22, 1988).

COORDINATOR RESPONSIBILITIES

The City Clerk is responsible for ensuring the implementation and the day to day administration of the City of Coralville’s Title VI Plan. The City Clerk is also responsible for implementing, monitoring, and ensuring the City’s compliance with the Title VI regulations.

GENERAL RESPONSIBILITIES

A. Public Dissemination

The City of Coralville will disseminate Title VI Program information to City employees, sub-recipients, and contractors, as well as the general public. Public dissemination will include posting of public statements, inclusion of Title VI language in contracts, and announcements of

hearings, and meetings in minority newspapers when determined necessary and funding is available.

B. Prevention of Discrimination

Procedures will be implemented to detect and eliminate discrimination when found to exist, including, but not limited to, issues of accessibility of training to all qualified City employees, utilization of Minority/Women/Disadvantaged Business Enterprises (DBE) contractors, public improvement, and material acquisition.

C. Reporting

The Coralville Transit Director will be responsible for any reporting required by IDOT and/or FTA.

D. Remedial Action

The City of Coralville will actively pursue the prevention of any Title VI deficiencies or violations and will take the necessary steps to ensure compliance through a program review with the program administrative requirements. If irregularities occur in the administration of the programs operation, procedures will be promptly implemented to resolve the Title VI issues and reduce to writing remedial action agreed to be necessary, all within a period not to exceed 90 days.

IDOT will be notified of any complaint filed at the City of Coralville involving Title VI issues, as to any resolution.

FILING A COMPLAINT

Applicability

The complaint procedures apply to the beneficiaries of the City of Coralville's programs, activities including but not limited to: the public, contractors, sub-contractors, consultants, employees, and other sub-recipients of federal and state funds.

Eligibility

If any individual, group of individuals, or entity believes that they or any other program beneficiaries have been subjected to discrimination prohibited by Title VI nondiscrimination provision as a recipient of benefits and/or services, or on the grounds of race, color, or national origin, they may exercise the right to file a complaint with the City of Coralville. Every effort will be made to resolve complaints informally at the agency, recipient, and/or contractor level.

Time Limitation on Filing Complaints

Title VI complaints may be filed with:

- City of Coralville
- Iowa Department of Transportation
- Federal Transit Administration
- U.S. Department of Transportation

In all situations, City of Coralville employees must contact the City Administrator immediately upon receipt of Title VI or related status complaints.

Complaints must be filed not later than 180 calendar days after:

- The date of the alleged act of discrimination; or
- The date the person became aware of the alleged discrimination; or

- Where there has been a continuing course of discriminatory conduct.

Complaints must be in writing, and must be signed by the complainant and/or the complainant's representative. The company must set forth as fully as possible the facts and circumstances surrounding the claimed discrimination.

A Title VI complaint form is available at the Coralville City Clerk's office during normal business hours and on the Coralville Transit website.

INTERNAL COMPLAINT PROCESSING

1. The City Clerk acting as the Title VI Coordinator, along with the City Administrator, will review the complaint upon receipt to ensure that all information is provided, the complaint meets the 180 day filing deadline and falls within the jurisdiction of the City.
2. The City Clerk and City Administrator will then investigate the complaint, if the complaint is against the City Clerk or City Administrator, then the Mayor and/or City Council or its designee will investigate the complaint. Additionally, a copy of the complaint will be forwarded to the City Attorney.
3. If the complaint warrants a full investigation, the complainant will be notified in writing by certified mail. This notice will name the investigator or investigating agency. The City will also notify the Iowa Department of Transportation Office of Employee Services/Civil Rights.
4. The party alleged to have acted in a discriminatory manor will also be notified by certified mail as to the complainant. This letter will also include the investigators name and will request that this party be available for an interview.
5. Any comments or recommendations from legal counsel will be reviewed by the Title VI Coordinator.
6. Once the City of Coralville is notified of Iowa Department of Transportation Office of Employee Services/Civil Rights investigative report findings, the City will adopt a final resolution.
7. All parties will be properly notified of the outcome of the Iowa Department of Transportation Office of Employee Services/Civil Rights report.
8. If the complainant is not satisfied with the results of the investigation of the alleged discriminatory practice(s), s/he shall be advised of their right to appeal IDOT's Office of Employee Services/Civil Rights decision. Appeals must be filed within 180 days after the City of Coralville's final resolution. Unless new facts not previously considered came to light, reconsideration of the City's determination will not be available.

The foregoing complaint resolution procedure will be implemented in accordance with the Department of Justice guidance manual entitled "Investigation Procedures Manual for the Investigation and Resolution of Complaints Alleging Violations of Title VI and Other Nondiscrimination Statutes," available online at:
www.usdoj.gov/crt/cor/Pubs/manuals/complain.html.

**CITY OF CORALVILLE
TITLE VI COMPLAINT FORM**

This form may be used to file a complaint with the City of Coralville based on violations of Title VI of the Civil Rights Act of 1964. You are not required to use this form, a letter that provides the same information may be submitted to file your complaint. Complaints must be filed within 180 calendar days.

Name: _____ Date: _____

Street Address: _____

City: _____ State: _____ Zip: _____

Telephone: (home) _____ (work) _____

Individual(s) discriminated against, if different than above (use additional pages if needed).

Name: _____ Date: _____

Street Address: _____

City: _____ State: _____ Zip: _____

Telephone: (home) _____ (work) _____

Please explain your relationship with the individual(s) indicated above:

Name of agency and department or program that discriminated:

Agency or department name:

Name of individual (if known): _____

Street Address: _____

City: _____ State: _____ Zip: _____

Date(s) of alleged discrimination:

Date Discrimination began _____

Last or most recent date _____

ALLEGED DISCRIMINATION:

