Iowa Northland Regional Council of Governments

Title VI Plan

October 15, 2026

INRCOG
Iowa Northland Regional
Council of Governments

Iowa Northland Regional Council of Governments

Title VI Plan

Agency information

Name and title of administrative officer

Name: Brian Schoon Title: Executive Director

Address: 229 E Park Ave

City: Waterloo State: IA ZIP code: 50703 County: Black Hawk

Phone/Fax: (319) 235-0311 | (319) 235-2891 Email: bschoon@inrcog.org

Name and title of designated Title VI coordinator

Name: Nick Fratzke Title: Director of Transportation

Address: 229 E Park Ave

City: Waterloo State: IA ZIP code: 50703 County: Black Hawk

Phone/Fax : (319) 235-0311 | (319) 235-2891 Email: nfratzke@inrcog.org

*If the Title VI coordinator changes, please contact the Iowa DOT Title VI specialist.

Title VI Program

I. Policy statement, authorities and citations

A. Policy of nondiscrimination

The Iowa Northland Regional Council of Governments (INRCOG), hereinafter referred to as the AGENCY, hereby assures that no person shall on the grounds of race, color, national origin, gender, age or disability, as provided by Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, and the Civil Rights Restoration Act of 1987, Pub. L. No. 100-259, 102 Stat. 28, be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance. The AGENCY further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, regardless of whether those programs and activities are federally funded.

It is the policy of the AGENCY to comply with Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e; Age Discrimination Act of 1975, 42 U.S.C. §§ 6101-6107; Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, 42 U.S.C. §§ 4601-4655; 1973 Federal Aid Highway Act, 23 U.S.C. § 324; Title IX of the Education Amendments of 1972, Pub. L. No. 92-318, 86 Stat. 235; Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. §§ 701 *et seq*; Civil Rights Restoration Act of 1987, Pub. L. No. 100-259, 102 Stat. 28; Americans with Disabilities Act of 1990, 42 U.S.C. §§ 12101 *et seq*.; Title VIII of the Civil Rights Act 1968, 42 U.S.C. §§ 3601-3631; Exec. Order No. 12898, 59 Fed. Reg. 7629 (1994) (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations); and Exec. Order No. 13166, 65 Fed. Reg. 50121 (2000) (Improving Access to Services for Persons with Limited English Proficiency).

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 AGENCY 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 AGENCY also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. In addition, the AGENCY will take reasonable steps to provide meaningful access to services for persons with limited-English proficiency. The AGENCY will, where necessary and appropriate, revise, update and incorporate nondiscrimination requirements into appropriate manuals, directives and regulations.

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

The AGENCY's Director of Transportation is responsible for initiating and monitoring Title VI activities, preparing reports and performing other responsibilities, as required by 23 C.F.R. § 200 and 49 C.F.R. § 21.



_____
Signature

Brian Schoon, Executive Director
Printed name and title

10/15/2026
Date

B. Authorities

Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d, provides that no person in the United States shall on the grounds of race, color, national origin, or gender be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance.

The 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, whether such programs and activities are federally assisted or not.

Environmental justice (EJ): Executive Order 12898 addresses disproportionate adverse environmental, social and economic impacts that may exist in communities, specifically minority and low-income populations.

Limited English Proficiency (LEP): Executive Order 13166 addresses access to services for persons whose primary language is not English and who have a limited ability to read, write, speak or understand English.

Americans with Disabilities Act of 1990 (ADA): The Act prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, state and local government services, public accommodations, commercial facilities and transportation.

Section 504 of the Rehabilitation Act of 1973, Pub. L. No. 93-112, 87 Stat. 355, prohibits discrimination based on disability.

C. Additional citations

Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d to 2000d-4; 42 U.S.C. §§ 4601 to 4655; 23 U.S.C. §109(h); 23 U.S.C. §324; DOT Order 1050.2; Executive Order 12250; Executive Order 12898; 28 C.F.R. § 50.3.

II. 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.

III. Organization, staffing and structure

A. Organizational chart – reporting relationships

(Place organizational chart here or attach to back of report with reference as what page to find it. Name the Title VI coordinator for your organization.)

B. Staffing

Metropolitan planning organization or regional planning affiliation administrator

The AGENCY administrator is authorized to ensure compliance with provisions of the department's policy of nondiscrimination and with the law, including the requirements of 23 C.F.R. § 200 and 49 C.F.R. § 21. The AGENCY grants compliance function and Title VI coordination shall be performed under the authority of the AGENCY.

Title VI coordinator

The AGENCY has appointed Nick Fratzke, Director of Transportation to perform the duties of the Title VI coordinator (Coordinator) and ensure implementation of the AGENCY's Title VI Federally Funded Transportation Program pertaining to this agreement.

The AGENCY will notify Iowa DOT in writing of any changes to the Coordinator or Coordinator contact information.

Title VI specialists (if applicable)

Additionally, the AGENCY has designated Title VI specialists (Specialists) in departmental special emphasis program areas. The Specialists, designated below, shall work in concert with the Coordinator. These key programs or department areas are subject to receiving federal assistance through grants or other types of transportation related funding, or are responsible for implementing AGENCY directives and policies to ensure civil rights compliance and equal opportunity. The Specialists will work with the Coordinator to ensure their respective departments and programs comply with Title VI regulations and assurances, meet the objectives of the Title VI plan, meet federal and state reporting requirements, and provide adequate training opportunities for applicable staff.

Specialists will work with the Coordinator to ascertain Title VI compliance by contractors, subcontractors, consultants and suppliers under federally funded projects or programs. Specialists will ensure applicable Title VI provisions and requirements are included in contractual agreements to prime contractors. Specialists will work with the Coordinator to obtain statistical data (race, color, national origin, age, gender, gender, LEP and income of populations in service area) of participants in, and beneficiaries of federally funded Iowa Department of Transportation programs. Each of the Specialists will maintain data relative to their respective special emphasis program area, designated below. The Coordinator shall use the data to complete annual Title VI reports and for other administrative needs.

List Title VI specialists and their official job title (if applicable)

III. Implementation procedures

Title VI coordinator's responsibilities and program administration

As authorized by the AGENCY Administrator, the Coordinator is responsible for initiating, monitoring, and ensuring AGENCY compliance with Title VI requirements as follows.

1. **Program administration.** Administer the Title VI program and coordinate implementation of the plan. Ensure compliance with the assurances, policy, and program objectives. Perform Title VI program reviews to assess administrative procedures, staffing, and resources; provide recommendations as required to the AGENCY administrator (see Section V: Self-Assessment and Remedial Action Procedures).

2. **Complaints.** Review written Title VI complaints that may be received by AGENCY following the adopted procedural guidelines (see Section IV: Complaint Procedures). Ensure every effort is made to resolve complaints informally at the local or regional level.

3. **Data collection.** Statistical data on race, color, national origin, age, disability, income level, language spoken, and gender of participants in, and beneficiaries of, programs is to be gathered and maintained by program area, as described in the Special Emphasis Program Areas Responsibilities Section VI of this document. The AGENCY will review the statistical data gathering process periodically to ensure sufficiency of data for meeting the requirements of Title VI program administration.

4. **Environmental documents.** To the maximum extent practical, ensure that appropriate data are included as a part of all environmental impact statements (EIS) or environmental assessments (EA) for projects receiving Federal Highway Administration or other federal assistance. Efforts are undertaken to ensure that transportation system improvements that are implemented do not have disproportionately negative effects on minority and low-income populations. In addition, system investments must provide for an equitable distribution of benefits to the areas that are traditionally underrepresented in the planning process.

5. **Training programs.** Conduct or facilitate training programs on Title VI issues and regulations for AGENCY employees; and facilitate Title VI training for appropriate staff, contractors and subrecipients. A summary of training conducted will be documented.

6. **Title VI plan update.** Review and update the AGENCY's Title VI plan as needed or required. Present updated plan to the AGENCY administrator for approval; submit amended plan to the Iowa DOT's Office of Employee Services' civil rights section (OES-CR).

7. **Public dissemination.** Work with AGENCY staff to develop and disseminate Title VI program information to AGENCY employees and subrecipients, including contractors, subcontractors, consultants, and subconsultants and beneficiaries, as well as the general public. Public dissemination may include postings of official statements, inclusion of Title VI language in contracts or other agreements, website postings, and annual publication of the AGENCY's Title VI Policy Statement in newspaper(s) having a general circulation, and informational brochures. Ensure public service announcements or notices are posted of proposed projects, hearings, meetings, or formation of public advisory boards, in newspapers or other media reaching the affected community. Ensure the full utilization of available minority publications or media; and, where appropriate, provide written or verbal information in languages other than English.

8. **LEP.** The AGENCY follows Executive Order 13166 in identifying and engaging LEP populations to ensure their involvement and knowledge of transportation planning and projects in and around their communities. A 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 AGENCY's policy for engaging individuals with LEP is to provide translation services to individuals who request them, if reasonable accommodations can be made. In addition, the AGENCY proactively identifies communities with high concentrations of LEP persons and employs tactics and strategies to effectively engage them in the planning process. The AGENCY 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.

9. **Elimination of discrimination.** Work with other AGENCY offices to establish procedures for promptly resolving deficiencies, as needed. Recommend procedures to identify and eliminate discrimination that may be discovered in any AGENCY processes. Take affirmative action to correct any deficiencies found within a reasonable time period, not to exceed 90 days, in order to implement Title VI compliance in accordance with this agreement.

10. **Maintain legislative and procedural information**. Federal laws, rules and regulations, Iowa DOT guidelines, the current AGENCY Title VI plan, annual accomplishment and goals reports, and other resource information pertaining to the implementation and administration of the AGENCY's Title VI program will be maintained and updated by the Coordinator. Information will be made available to other AGENCY departments/offices or the public as requested or required.

IV. Discrimination complaint procedures – allegations of discrimination in federally assisted programs or activities

(If the Agency has existing complaint procedures, insert those here.)

The AGENCY adopts the following discrimination complaint procedures for complaints relating to federally assisted transportation-related programs or activities.

1. **Filing a discrimination complaint:** Any person who believes that he or she, or any class of individuals, or in connection with any disadvantaged business enterprise, has been or is being subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973, and/or the Civil Rights Restoration Act of 1987, as amended, has the right to file a complaint.

   Any individual wishing to file a discrimination complaint must be given the option to file the complaint with the AGENCY, or directly with the Iowa DOT, FHWA, USDOT and U.S. Department of Justice. Complaints may be filed with all agencies simultaneously.

   No individual or agency shall refuse service, discharge or retaliate in any manner against any persons because that individual has filed a discrimination complaint, instituted any proceeding related to a discrimination complaint, testified, or is about to testify, in any proceeding or investigation related to a discrimination complaint, or has provided information or assisted in an investigation.

2. **Complaint filing timeframe:** A discrimination complaint must be filed within 180 calendar days of either:
   (a) The alleged act of discrimination.
   (b) Date when the person(s) became aware of the alleged discrimination.
   (c) Date on which the conduct was discontinued, if there has been a continuing course of conduct.

   The AGENCY or their designee may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing.

3. **Contents of a complaint:** A discrimination complaint must be written. The document must contain the following information.

a) The complainant's name and address, or other means by which the complainant may be contacted.
b) Identification of individual(s) or organization(s) responsible for the alleged discrimination.
c) A description of the complainant's allegations, which must include enough detail to determine if the AGENCY has jurisdiction over the complaint and if the complaint was filed timely.
d) Specific prohibited bases of alleged discrimination (i.e., race, color, gender, etc.).
e) Apparent merit of the complaint.
f) The complainant's signature or signature of his/her authorized representative.

In the event that a person makes a verbal complaint of discrimination to an officer or employee of the AGENCY, the complainant shall be interviewed by the AGENCY's Coordinator. If necessary, the Coordinator will assist the complainant in reducing the complaint to writing and then submit the written version of the complaint to the person for signature.

4. **Complaints against the AGENCY:** Any complaints received against the AGENCY should immediately be forwarded to the Iowa DOT for investigation. The AGENCY shall not investigate any complaint in which it has been named in the complaint. The contact information for the Iowa DOT's Title VI program is:

Iowa Department of Transportation
Office of Employee Services – Civil Rights
800 Lincoln Way
Ames, Iowa 50010
515-509-8814
515-232-6739 (fax)
civil.rights@iowadot.us

5. **Notice of Receipt**: All complaints shall be referred to the AGENCY's Coordinator for review and action. Within 10 days of receipt of the discrimination complaint, the Coordinator shall issue an initial written Notice of Receipt that:
   a) Acknowledges receipt of the discrimination complaint.
   b) Advises the complainant of his/her right to seek representation by an attorney or other individual of his or her choice in the discrimination complaint process.
   c) Contains a list of each issue raised in the discrimination complaint.
   d) Advises the complainant of the timeframes for processing the discrimination complaint and providing a determination.
   e) Advises the complainant of other avenues of redress of their complaint, including the Iowa DOT, FHWA, USDOT and USDOJ.
   f) Includes an invitation to mediation as described in paragraph 1 under item eight below.

6. **Notification of the Iowa DOT of a complaint:** The AGENCY shall advise the Iowa DOT within 10 business days of receipt of the complaint. Generally, the following information will be included in every notification to the Iowa DOT.
   a) Name, address and phone number of the complainant.
   b) Name(s) and address(es) of alleged discriminating official(s).
   c) Basis of complaint (i.e., race, color, national origin or gender).
   d) Date of alleged discriminatory act(s).
   e) Date complaint received by the AGENCY.
   f) A statement of the complaint.
   g) Other agencies (state, local or federal) where the complaint has been filed.
   h) An explanation of the actions the AGENCY has taken or proposed to resolve the issue identified in the complaint.

7. **Processing a complaint and timeframe:** The total time allowed for processing the discrimination complaint is 90 calendar days from the date the complaint was filed. There is no extension available at this level. This timeframe includes 60 calendar days at the AGENCY level and 30 days for review at the state level, if needed.

If the complainant elects to file a complaint with both the AGENCY and Iowa DOT, the complainant shall be informed that the AGENCY has 90 calendar days to process the discrimination complaint and the Iowa DOT shall not investigate the complaint until the 90 calendar-day period has expired.

Immediately after issuance of the notice of receipt to the complainant (step four), the AGENCY's Coordinator shall either begin the fact-finding or investigation of the discrimination complaint, or arrange to have an investigation conducted.

Based on the information obtained during that investigation, the Coordinator shall render a recommendation for action in a Report of Findings to the head of the AGENCY.

8. **Alternative dispute resolution/mediation process:** The complainant must be given an invitation to participate in mediation to resolve the complaint by informal means. The AGENCY's Coordinator shall include an invitation to mediation with the Notice of Receipt, offering the opportunity to use the alternative dispute resolution/mediation process.

   If the complaint selects mediation, it allows disputes to be resolved in a less adversarial manner. With mediation, a neutral party assists two opposing parties in a dispute come to an agreement to resolve their issue. The mediator does not function as a judge or arbiter, but simply helps the parties resolve the dispute themselves.

   Upon receiving a request to mediate, the AGENCY's Coordinator shall identify or designate a mediator who must be a neutral and impartial third party. The mediator must be a person acceptable to all parties and who will assist the parties in resolving their disputes.

   If the complainant chooses to participate in mediation, she or he or the designee must respond in writing within 10 calendar days of the date of the invitation. This written acceptance must be dated and signed by the complainant and must also include the relief sought.

   After mediation is arranged, a written confirmation identifying the date, time and location of the mediation conference shall be sent to both parties. If possible, the mediation process should be completed within 30 calendar days of receipt of the discrimination complaint. This will assist in keeping within the 90 calendar-day timeframe of the written Notice of Final Action if the mediation is not successful.

   If resolution is reached under mediation, the agreement shall be in writing. A copy of the signed agreement shall be sent to the Iowa DOT's Title IV program coordinator. If an agreement is reached, but a party to it believes his/her agreement has been breached, the nonbreaching party may file another complaint. If the parties do not reach resolution under mediation, the AGENCY's Coordinator shall continue with the investigation.

9. **Notice of Final Action:** A written Notice of Final Action shall be provided to the complainant within 60 days of the date the discrimination complaint was filed. It shall contain:
   a) A statement regarding the disposition of each issue identified in the discrimination complaint and reason for the determination.
   b) A copy of the mediation agreement, if the discrimination complaint was resolved by mediation.
   c) A notice that the complainant has the right to file a complaint with the Iowa DOT, FHWA, USDOT or USDOJ within 30 calendar days after the Notice of Final Action, if she or he is dissatisfied with the final action on the discrimination complaint.

   The AGENCY's Coordinator shall provide the Iowa DOT's Title VI program coordinator with a copy of this decision, as well as a summary of findings upon completion of the investigation. Should deficiencies be noted in the implementation of these discrimination complaint procedures by the AGENCY, the Iowa DOT's Title VI program coordinator will work in conjunction with the AGENCY's Coordinator to review the information and/or provide technical assistance in the discrimination complaint process, mediation process, and/or investigation.

10. **Corrective action:** If discrimination is found through the process of a complaint investigation, the respondent shall be requested to voluntarily comply with corrective action(s) or a conciliation agreement to correct the discrimination.

11. **Confidentiality:** AGENCY and Iowa DOT Title VI program coordinators are required to keep the following information confidential to the maximum extent possible, consistent with applicable law and fair determination of the discrimination complaint.
    a) The fact that the discrimination complaint has been filed.
    b) The identity of the complainant(s).
    c) The identity of individual respondents to the allegations.
    d) The identity of any person(s) who furnished information relative to, or assisting in, a complaint investigation.

12. **Recordkeeping**: The AGENCY's Coordinator shall maintain a log of complaints filed that alleged discrimination. The log must include:
    a) The name and address of the complainant.
    b) Basis of discrimination complaint.
    c) Description of complaint.
    d) Date filed.
    e) Disposition and date.
    f) Any other pertinent information.

    All records regarding discrimination complaints and actions taken on discrimination complaints must be maintained for a period of not less than three years from the final date of resolution of the complaint.

V. Self-assessment and remedial action procedures

1. **Title VI self-assessment federal-aid highway funds.** Conduct Title VI self-assessment of the AGENCY's program areas and activities**.** Where applicable, revise policies, procedures and directives to include Title VI requirements. Ensure that programs, policies and other activities do not have disproportionate adverse effects on minority and low income populations.

2. **Remedial action.** When irregularities occur in the administration of Federal-aid highway programs, corrective action will be taken to resolve identified Title VI issues. Take affirmative action to correct any deficiencies found by the Iowa DOT, FHWA or the USDOT within a reasonable time period, not to exceed 90 days, in order to implement Title VI compliance in accordance with this plan. The head of the AGENCY shall be held responsible for implementing Title VI requirements.

VI. Title VI implementation activities in special emphasis program areas

The following activities may or may not apply to your AGENCY. Please adjust as needed.

A. Planning and location activities

1. **Planning process.** The AGENCY has responsibility for providing long-range planning, program development, and capital programming necessary to provide efficient transportation services to AGENCY citizens. The AGENCY's Executive Director and Transportation Department annually updates and coordinates the AGENCY's four-year plan for transportation improvement programs and projects. The update also informs other AGENCY department of the AGENCY's jurisdiction of the current planning direction for transportation needs. Projects included in the update are the result of evaluation and prioritization of needs in various transportation areas. The evaluation process includes input from the AGENCY, local jurisdictions and organizations, citizen groups and private individuals.

2. **Public involvement in planning activities and Title VI and EJ**

    a) Invite participation of a cross section of the populace from social, economic and ethnic groups in the planning process by disseminating written program information to minority media and ethnic

organizations, and providing public service announcements for all local media, when forming citizen advisory committees or planning board, and requesting involvement.

b) To ensure access to public meetings, evening meetings will be conducted in a variety of community buildings throughout the AGENCY, including those along transit routes, ensure translation services are available if anticipated, and ensure public meetings are held in predominantly minority communities when transportation projects will specifically impact those communities.

c) The AGENCY regularly conducts an analysis of how the benefits and burdens of the long-range plan are distributed among low-income, minority and disabled populations versus the general population. The analysis utilizes the demographic profile (included). The AGENCY is responsible for informing all staff members and consultants of all federal Title VI policies, including any changes and updates. In addition, the AGENCY is responsible for informing all staff members and consultants of the AGENCY's Title VI plan, including the LEP plan, public involvement plan, environmental justice policy, and ADA policy, as well as any updates and changes.

B. Consultant contracts activities

1. **Consultant contracts administration**. The Executive Director is responsible for recommending consultant firms to the AGENCY for final selection, negotiation and award. The Executive Director administers awarded consultant contracts.

2. **Consultant selection process.** Transportation Department staff will request qualifications from consulting firms specializing in various areas that may relate to public works projects and the development of construction plans and special provisions for roads and bridges, design work associated with structures, performing environmental studies or preparing National Environmental Policy Act of 1969 documents. Consultant selection from the certified list maintained by the AGENCY adheres to State of Iowa regulations and is consistent with the AGENCY's vendor policies. Title VI text is included in all request for proposals (RFP) and contracts.

3. **Title VI assurances and provisions**

   a) Include Title VI assurance and provision language in all federally funded consultant contracts. Periodically review documents and language to ensure compliance with current laws and regulations. Provide a copy of the form of the contract to the Coordinator, and any amendments or updates that may occur over time.

C. Design and engineering/environmental activities

1. **Design /Environmental Review Process and Title VI**

   a) Depending on the scope, complexity, and impacts of a project, a National Environmental Policy Act document and process will be completed.

   b) Monitor compliance with Title VI requirements in all aspects of conducting an EIS or EA. Provide a comprehensive summary of the demographic and environmental data elements to be considered by the EIS/EA process to the Coordinator; including updated summary lists as applicable. Incorporate into the review process, adequate time for the Coordinator to review and comment, as applicable, on the draft EIS/EA to ensure there are no violations of the Federal Civil Rights Act, as amended, as a result of the AGENCY's Federal-aid highway activities.

   c) In order to ensure dissemination of information and foster participation from affected populations, AGENCY staff will place public notices in applicable general and minority media; select accessible locations and times for public hearings or meetings, and arrange for translation services as needed; particularly in projects impacting predominantly minority communities. The AGENCY will ensure the public has information pertaining to their rights to call or write the AGENCY to view plans and discuss environmental problems.

d) AGENCY staff shall provide a copy of the Annual Construction Report to the Coordinator in or around April of each year. The Coordinator shall work with the AGENCY geographic information systems coordinator to generate a map of the federally funded transportation projects to include demographic data of the neighborhoods affected by the projects.

e) Environmental justice

The concept of environmental justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies or activities on the minority and low-income population groups. Within the context of transportation planning, environmental justice considers the relative distribution of cost and benefits from transportation investment strategies and policies among different segments of society.

A systematic process is used to study and evaluate all necessary environmental aspects of the proposed action(s). Depending on the scope, complexity, and impacts of the project, the AGENCY's Coordinator oversees the process, ensures all federal and state requirements are met, and the public has been invited to participate. The AGENCY is responsible for environmental review, and Title VI environmental justice compliance in all aspects of AGENCY's work that triggers environmental review requirements.

D. Right of way activities

1. **Real property services.** N/A or position name manages and coordinates the appraisal and acquisition of real property and relocation assistance services for public works projects. The right of way acquisition process entails appraisal of property, negotiation of terms and conditions for acquisition, and assistance in the relocation of displaced individuals, businesses, farm operations, nonprofit organizations, and property management.

2. **Right of way activities and Title VI**

a) Ensure equal opportunity in all aspects of procuring real estate service contracting and appraisal agreements.

b) Follow adopted vendor procurement policies in the acquisition of contracted services.

c) Utilize current directories identifying fee appraiser organizations and the Iowa DOT's list of certified fee appraisers when seeking services. Maintain data on awards to minority and female appraisers, and provide data to the Coordinator on a quarterly basis.

d) Incorporate Title VI language and assurance statements in all surveys of property owners and tenants after the conclusion of all business. Coordinate the preparation of deeds, permits and leases to ensure the inclusion of the appropriate clauses, including Title VI assurances.

e) Ensure that appraised values and communications associated with the appraisal and negotiation operations result in equitable treatment.

f) Ensure comparable replacement dwellings are available and assistance is given to all displaced persons and entities by the property acquisition process.

g) Maintain statistical data, including race, color, national origin, age, gender, disability, LEP and income levels on all relocatees affected by federally funded projects, and provide detailed demographic data quarterly to the Coordinator.

E. Construction and maintenance activities

1. **Construction management section.** N/A or position name is responsible for administration of all new construction contracts. N/A or position name is responsible for oversight and the administration of transportation construction projects, as set forth by policy decisions and supervision of the AGENCY engineer.

2. **Maintenance.** N/A or position name is responsible for the efficient program for maintaining AGENCY roads, bridges and parks/grounds by economically utilizing the resources of contractors, equipment and materials.

3. Construction and maintenance activities and Title VI

a) Review all federally funded projects for application of disadvantage business enterprise (DBE) goals. As appropriate, include DBE provisions in those projects with designated goals. Include Title VI language in bid announcements and applicable construction documents, as stipulated in the AGENCY's Title VI Policy Statement and Title VI Assurances, which are attached to this plan.

b) Award construction contracts on the basis of lowest responsive bidder, as well as meeting DBE requirements. Include Title VI and DBE language in prime contract award letters to encourage utilization of DBE subcontracts and vendors.

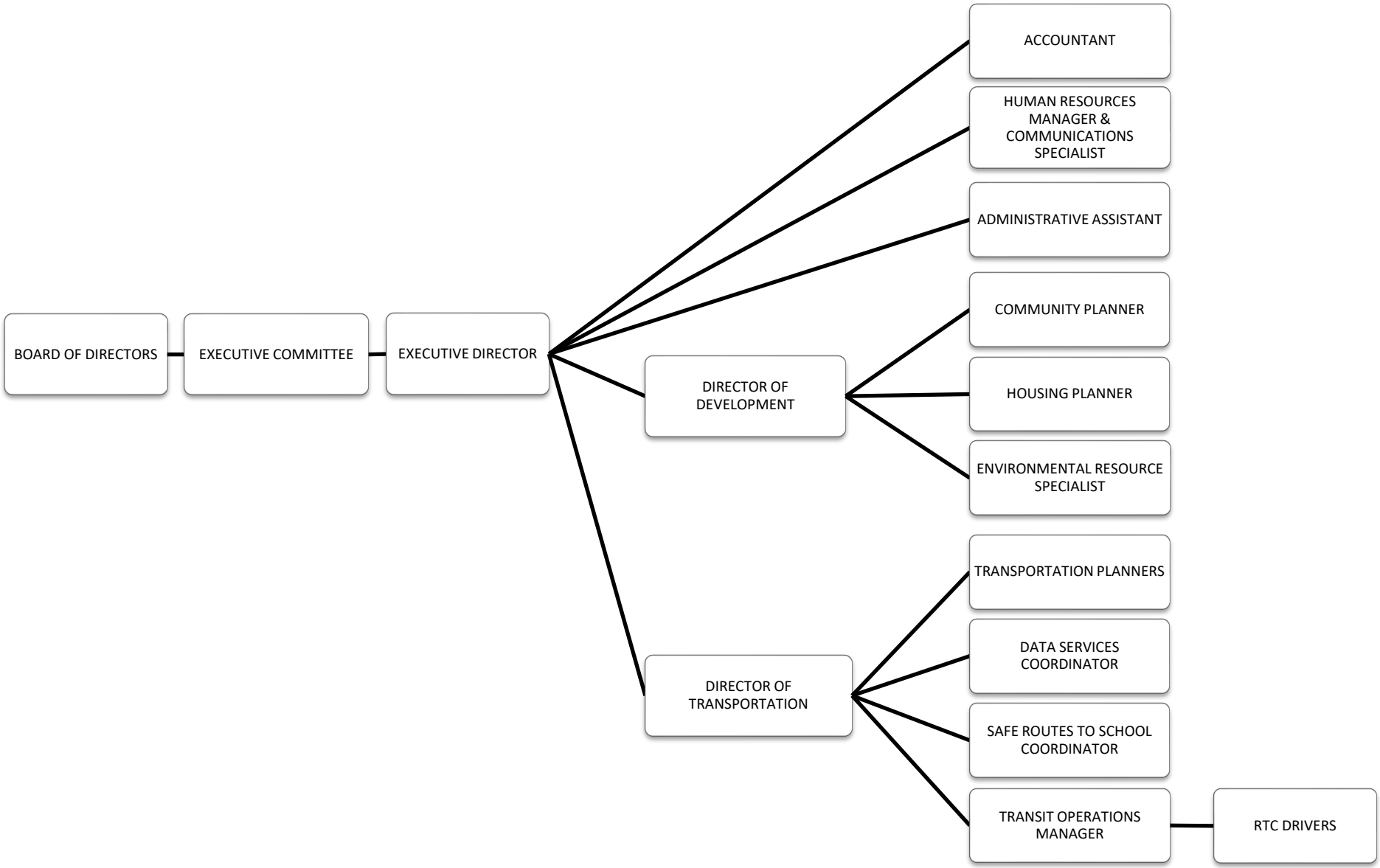
c) Ensure that prime contractors with DBE requirements award contracted work to qualified DBEs that perform commercially useful functions.

d) Monitor all maintenance and construction operations to ensure nondiscrimination throughout all operations.

e) Coordinate the gathering of maintenance and construction information regarding DBE participation and provide to the Coordinator.

Iowa Northland Regional Council of Governments

Organizational Chart



INRCOG
Iowa Northland Regional Council of Governments

July 2026