



# **IOWA CITY TRANSIT TITLE VI/LEP PLAN**

**April 2025 – April 2028**

City of Iowa City  
410 E Washington Street  
Iowa City, IA 52240

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## **ATTACHMENTS**

- **Attachment A: Certifications and Assurances**
- **Attachment B: Iowa City City Council Resolution Approving Title VI**
- **Attachment C: Iowa City Transit Title VI Complaint Form**
- **Attachment D: Title VI Contract Language for Transit Projects**
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## **INTRODUCTION**

The purpose of this document is to ensure that transit services operated in the City of Iowa City are in compliance with the FTA Circular 4702.1B 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 ASSURANCES**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. The FY2024 Certifications and Assurances for Iowa City Transit were pinned into TrAMS on April 3, 2024. (Attachment A)

## **PREPARE AND SUBMIT A TITLE VI PROGRAM**

In accordance with 49 CFR Section 21.9(b), all direct and primary recipients document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. Iowa City Transit's current Title VI Program expires on May 31, 2025 and will submit an updated Title VI every three years after this date.

The Iowa City City Council, Iowa City Transit's governing body, approved Iowa City Transit's Title VI Program on April 1st, 2025. Iowa City Transit operates a fixed route service with 21 buses at peak time and contracts paratransit service with Johnson County SEATS using 13 light-duty buses, serving a population of 75,264. This document contains all the elements required of a fixed route transit provider operating in an urbanized area of less than 200,000 in population and operating less than fifty vehicles in peak service. Since Iowa City Transit does not qualify as a large urbanized area (UZA) all general requirements under Chapter III are included as well as system-wide standards and policies under Chapter IV.

Johnson County SEATS provides contracted paratransit services to Iowa City Transit. Since Iowa City Transit uses their 5310 funding in the paratransit services contract, Johnson County SEATS is considered a sub recipient. Johnson County SEATS, with assistance from the East Central

Iowa Council of Governments (Regional Planning Office), has produced and adopted a Title VI Program. Iowa City Transit will require Johnson County SEATS to submit its Title VI Program at least six months prior to Iowa City Transit's Title VI expiration date, every three years. The new 5-year paratransit service contract between Iowa City Transit and Johnson County SEATS took effect on August 1, 2023. Currently, Johnson County SEATS has no outstanding lawsuits or complaints. Johnson County SEATS does have an advisory committee that includes a representative from Iowa City Transit and the Iowa City City Council. The committee meets on a quarterly basis.

## **NOTIFICATION OF BENEFICIARIES OF PROTECTION UNDER TITLE VI**

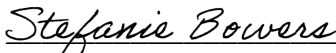
### **IOWA CITY TRANSIT TITLE VI POLICY STATEMENT**

The City of Iowa City assures that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259), be excluded from or participation in, be denied benefits of, or be otherwise subjected to discrimination under any program or activity. The City of Iowa City further assures every effort will be made to ensure nondiscrimination in all of its committees, programs, and activities, regardless of the funding source.

Iowa City Transit will include Title VI language in all written agreements and bid notices and will monitor compliance.

The Iowa City Transportation Services Director will be responsible for initiating and monitoring Title VI activities, and all other responsibilities as required. The Iowa City Civil Rights Coordinator will be responsible for investigating complaints only.

	April 2, 2025
_____ Darian Nagle-Gamm, Director of Transportation Services	_____ Date

	April 2, 2025
_____ Stefanie Bowers, Human Rights Coordinator	_____ Date

## **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, or sex 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 CFR 21).

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 of Federal Aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100-259 {S.557} March 22, 1988).

### **COORDINATOR RESPONSIBILITIES**

The Iowa City Transportation Services Director is responsible for ensuring the implementation and the day-to-day administration of the Iowa City Transit Title VI Plan. The Civil Rights Coordinator will be responsible for investigating complaints only. The Iowa City Transportation Services Director will be responsible for implementing, monitoring, and ensuring the City’s compliance with the Title VI regulations.

### **GENERAL RESPONSIBILITIES**

#### **A. Public Dissemination**

The City of Iowa City will disseminate Title VI Program information to Iowa City Transit 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. All complaints are confidential and may be made available to those assisting in an investigation.

#### **C. Reporting**

The Iowa City Transportation Services Director will be responsible for any reporting required by Iowa DOT and/or FTA.

#### **D. Remedial Action**

The City of Iowa City 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 Title VI issues and reduce to writing remedial action agreed to be necessary, all within a period not to exceed 90 days.

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

### **FILING A COMPLAINT**

#### **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, national origin, or sex, they may exercise the right to file a complaint with the City of Iowa City. Every effort will be made to resolve complaints informally at the agency, recipient, and/or contactor level.

#### Time Limitation on Filing Complaints

Title VI complaints may be filed with:

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

In all situations, Iowa City Transit employees must contact the Iowa City Transportation Services Director and/or the Iowa City Civil Rights Coordinator immediately upon receipt of Title VI or related statutes complaints.

Complaints must be filed not later than 180 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 complainant must set forth as fully as possible the facts and circumstances surrounding the claimed discrimination.

A Title VI complaint form is available at the Iowa City City Clerk's office, the Iowa City Transportation Services office, or the Iowa City Civil Rights Coordinator's office during normal business hours.

#### **INTERNAL COMPLAINT PROCESSING**

1. The Iowa City Civil Rights Coordinator acting as Title VI Coordinator, along with the City Manager, 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 Iowa City Civil Rights Coordinator will then 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 and 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 manner will also be notified by certified mail as to the complaint. 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 Iowa City 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 Iowa DOT's Office of Employee Services/Civil Rights decision. Appeals must be filed within 180 days after the City of Iowa City'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".

### **TRANSIT RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

There are no active lawsuits or complaints alleging discrimination on the basis of race, color, or national origin with respect to transit service provided by Iowa City Transit.

Iowa City Transit has not been asked to take part in any local, state, or federal civil rights compliance reviews in the past three years. Iowa City Transit has not undertaken any federally funded construction projects in the past three years.

### **PROMOTING INCLUSIVE PUBLIC PARTICIPATION**

Public participation procedures are established to allow and encourage participation in Iowa City Transit's service area and include low income and minority individuals and those with limited English proficiency. Iowa City Transit's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in Iowa City Transit's service planning and development process. Iowa City Transit's PPP includes a description of when the public participation plan is used, regional partnerships/capital programming, meeting locations, addressing comments, and the identification of stakeholders.

### **When the Public Participation Plan (PPP) is Used**

Iowa City Transit will use its PPP when considering fare changes, modifications to routes and schedules, and other transit planning projects. Including:

- Any fare increases for the cost of a general public fare, and subsequent adjustments to youth and reduced fares
- A new route is established
- Elimination of an existing route
- A major service reduction involving 25% or more of the route miles of the system

Iowa City Transit will post service change notices on appropriate buses thirty days in advance of the change date for minor schedule and service changes.

### **Regional Partnerships/Capital Programming**

For its capital programming, including major facility and bus procurement, Iowa City Transit uses the Metropolitan Planning Organization of Johnson County's (MPOJC) adopted Public Participation Plan (PPP). The plan targets interest groups representing unique users of the transportation system as well as groups involved in the growth and development of the metropolitan area. The MPOJC PPP was adopted in July of 2022. This plan clearly indicates that the MPO's public participation process satisfies Iowa City Transit's public participation requirements for its Program of Projects and the notices for the regional Transportation Improvement Program (TIP).

- Iowa City Transit also participates in the Passenger Transportation Plan (PTP) process with other transportation services, both public and private, in the Iowa City Urbanized Area. The PTP is a short-range plan that analyzes all aspects of transit operations and is required by the Iowa Department of Transportation. The PTP Update is required every 5 years with and is reviewed annually by the MPOJC Urbanized Area Policy Board. Public participation regarding the PTP has been ongoing since 2007 with focus groups and interviews with transportation stakeholders, surveys, review of local plans, participation in regional transportation planning sessions, and the gathering of background information. Iowa City Transit will be represented on the MPOJC's PTP steering committee which is made up of local human services organizations and public transit providers.
- Iowa City Transit participated in the MPOJC's Long-Range Transportation Plan open houses in Coralville, North Liberty, and Iowa City to gather public input regarding transit issues and participated in two surveys regarding transit service. The surveys were used in the MPOJC's 2050 Long-Range Transportation Plan.
- Iowa City Transit is a member of the Johnson County SEATS Paratransit Advisory Committee. The Committee membership includes public transit providers and riders of the paratransit system operated by Johnson County SEATS. Various community stakeholders attend these meetings. The Committee meets on a quarterly basis to discuss paratransit needs.
- Quarterly transit manager meetings (or as needed), including Iowa City Transit, Coralville Transit, University of Iowa Cambus, and Johnson County SEATS.
- Iowa City Transit is a voting member of the MPOJC Transportation Technical Advisory Committee (TTAC). The TTAC comments and makes recommendations to MPOJC's Urbanized Area Policy Board.
- Iowa City Transit will also hold public hearings as needed regarding any change to the transit routes or fares.

### **Meeting locations**

When determining locations and schedules for public meetings, Iowa City Transit will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities
- Coordinate with community organizations and the MPO to implement public engagement strategies that reach out to members of affected minority and/or LEP communities
- Consider media outlets that serve LEP populations



- Provide opportunities for public participation through written communications, group discussions, and one-on-one interviews.
- Provide rides home from public participation meetings when transit is not in service or is infrequent

### **Addressing Comments**

All comments received through the public participation plan are given careful, thoughtful consideration. Because there are a number of different ways riders or members of the community can comment on proposed service or fare changes, all comments will be assembled into a single document for presentation to the Iowa City City Council.

### **Identification of Stakeholders**

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected or may be denied benefits of a plan's recommendations, are of particular interest in the identification of specific stakeholders. While stakeholders may vary based on the plan or program being considered, Iowa City Transit will assemble a listing of stakeholders with whom we may regularly communicate by email or direct mail. Iowa City Transit has assembled a list of stakeholders; including:

Community Transportation Committee  
Center for Worker Justice  
International Center/University of Iowa  
Neighborhood Centers of Johnson County

### **PROVIDE MEANINGFUL ACCESS TO LEP PERSONS**

Iowa City Transit, with assistance from the MPOJC, has conducted the following analysis to meet requirements under Title VI of the Civil Rights Act of 1964. This Act seeks to improve access to services for persons with Limited English Proficiency (LEP). The following uses the Four Factor Analysis identified in the LEP Guidance.

#### **A. Four Factor Analysis**

**Factor 1:** Assessing the number and proportion of LEP persons served or encountered in the eligible service population

##### **Task 1, Step 1; Examine prior experiences with LEP individuals**

Iowa City Transit serves a diverse community. The University of Iowa brings people from all over the world to the Iowa City urbanized area which includes not only Iowa City but the communities of University Heights, Coralville, North Liberty, and Tiffin. Iowa City Transit has a service contract with the City of University Heights and operates in and around the University of Iowa campus. Most non-English residents residing in Iowa City are affiliated with the University of Iowa, either as an international student or visiting scholar. The University has, on average, an international student population of 2,000-3,000 persons on an annual basis as well as approximately 400 visiting scholars.

##### **Task 1, Step 2; Become familiar with data from the U.S. Census**

The Iowa City Urbanized Area includes the municipalities of Coralville, Iowa City, North Liberty, Tiffin, and University Heights. According to the U.S. Census Bureau, the population for the urbanized area was 84,672 in 2000, 91,881 in 2005, 103,152 in

2010, 107,912 in 2014, 118,506 in 2019, and 125,395 in 2023. These numbers represent an average annual population growth of 1.7%.

Iowa City's current demographics:

<b>Iowa City Statistics and Demographics</b>	<b>Number</b>	<b>Percent</b>
<b>Iowa City Population</b>	75,264	100.0
<b>SEX AND AGE</b>		
Male	36,738	48.8
Female	38,526	51.2
Under 5 years	3,141	4.2
5 to 9 years	2,998	4.0
10 to 14 years	2,691	3.6
15 to 19 years	8,791	11.7
20 to 24 years	18,288	24.3
25 to 34 years	10,921	14.5
35 to 44 years	7,301	9.7
45 to 54 years	6,214	8.3
55 to 59 years	2,709	3.6
60 to 64 years	3,071	4.1
65 to 74 years	5,346	7.1
75 to 84 years	2,543	3.4
85 years and over	1,250	1.7
Median age (years)	26.3	(X)
18 years and over	64,758	86.0
21 years and over	53,293	70.8
62 years and over	10,784	14.3
65 years and over	9,139	12.1
18 years and over	64,758	86.0
Male	31,578	48.8
Female	33,180	51.2
65 years and over	9,139	12.1
Male	4,054	44.4
Female	5,085	55.6
<b>RACE</b>		
One Race	70,183	93.2
White	56,551	75.1
Black or African American	6,342	8.4

American Indian and Alaska Native	186	0.2
Asian	5,156	6.9
Asian Indian	994	1.3
Chinese	1,797	2.4
Filipino	101	0.1
Japanese	123	0.2
Korean	627	0.8
Vietnamese	821	1.1
Other Asian	693	0.9
Native Hawaiian and Other Pacific Islander	14	0.0
Some Other Race	1,934	2.6
Two or More Races	5,081	6.8
<b>HISPANIC OR LATINO</b>		
Hispanic or Latino (of any race)	6,088	8.1
Mexican	3,071	4.1
Puerto Rican	796	1.1
Cuban	232	0.3
Other Hispanic or Latino	1,989	2.6
Not Hispanic or Latino	69,176	91.9
White alone	54,459	72.4
<b>HOUSEHOLDS BY TYPE</b>		
Total Households	30,780	( X )
Family Households	12,434	100.0
Married-couple family	9,912	79.9
Male householder, no spouse present	691	5.6
Female householder, no spouse present	1,831	14.7
Nonfamily households	18,346	59.6
65 years and over	3,229	10.5
Households with individuals under 18 years	5,202	16.9
<b>HOUSING OCCUPANCY</b>		
Total housing units	33,844	( X )
Occupied housing units	30,588	90.4
Vacant housing units	3,256	9.6
Homeowner vacancy rate (percent)	0.0	( X )
Rental vacancy rate (percent)	9.8	( X )
<b>HOUSING TENURE</b>		
Occupied housing units	30,588	( X )
Owner-occupied housing units	13,288	43.4
Average household size of owner-	2.52	( X )

occupied units		
Renter-occupied housing units	17,300	56.6
Average household size of renter-occupied units	1.99	( X )
<i>Source: U.S. Census Bureau, 2023 American Community Survey 5-year Estimates</i>		

There were 2,084 international students according to the University of Iowa's fall 2024 enrollment statistics, which represents 6.5% of the University of Iowa student enrollment. The largest national representations of international students and scholars at the University of Iowa are from Asia, as shown below:

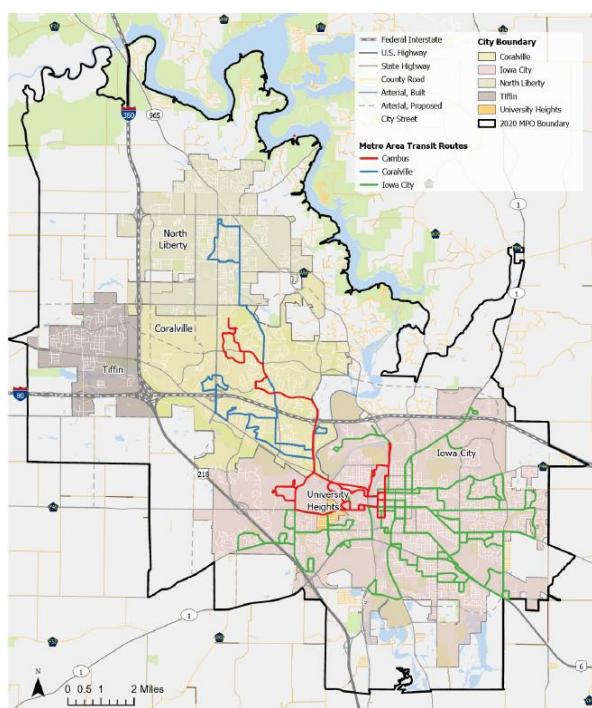
### UI International Students and Scholars: 5 Largest National Representatives

National Representation	Student Population	Scholar Population
China	484	134
India	387	115
South Korea	139	38
Nigeri	111	5
Iran	75	9

*Source: The University of Iowa, International Programs Annual Report 20024*

### Task 1, Step 2A; Identify the geographic boundaries of the area that your agency serves

The Iowa City Transit service area is defined by the city limits of Iowa City and University Heights, and the University of Iowa campus. (Transit Service Area Map of Iowa City Urbanized Area)



### Task 1, Step 2B; Obtain Census data on LEP population in your service area

In determining the number or proportion of LEP persons in Johnson County, including the City of Iowa City, 2023 U.S. Census American Community Survey (ACS) data was evaluated. According to ACS data, 22,686 persons in Johnson County (15.5% of the population) spoke a language other than English at home. Of the 22,686 persons residing in Johnson County who spoke a language other than English at home, 7,714 (5.3% of the population) reported speaking English less than “very well”, or in other words, would be considered to have limited English proficiency. The table below shows the language subgroups as follows:

#### **Persons in Johnson County Who Reported Speaking English Less Than “Very Well”**

<b>Language Spoken</b>	<b>Number of Persons</b>	<b>Percent of Total Population</b>
Spanish	1,734	1.2%
Other Indo-European language	1,903	1.3%
Asian & Pacific Island language	2,067	1.4%
Other languages	2,010	1.4%

*Source: American Community Survey, 2023 ACS 5 Year Estimates*

### Task 1, Step 2C; Analyze the data collected

According to The University of Iowa’s *Fall 2024: A Profile of Students Enrolled*, China, India, South Korea, Nigeria, and Iran remain the top represented countries in the international student population. The number of students from Iran (75 students) increased from the fall of 2017 (63 students), but fell to fifth place behind Nigeria (111 students) in 2025. Malaysia (57 students from the fall 2017) is no longer one of the top 5 countries in the largest international student enrollment representations. While the same data is not available for the international scholar population, it can be assumed that past national representation trends found among the student population can be applied to the international scholar population, as three of the top five represented countries are the same for both international students and scholars in 2024.

The University of Iowa offers skills courses, such as oral, writing, and listening, to students who do not speak English as their first language. These students are placed in specific courses based on ESL (English as a Second Language) testing results. The University does not offer intensive English courses.

Iowa City Transit assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators. To date, the transit agencies have had very little to no contact with LEP persons.

### Task 1, Step 2D; Identify any concentrations of persons within service area

No large concentrations of LEP persons exist in the Iowa City urbanized area.

Task 1, Step 3; Consult state and local sources of data

The Iowa City Community School District (ICCS) and the Iowa Department of Education compile information regarding the number of students receiving English Language Learning (ELL) services. The ICCS ELL services predominantly serve Spanish, Arabic, French, and Swahili speakers, similar to many of Iowa's schools. For the 2023-2024 school year, there are 14,378 students (IA Dept. of Education Certified Enrollment) in the ICCS. Of those, 15.3% (2,200 students) receive English Language Learning services. This is up from the 12.6% (1,836 students) receiving ELL services in the 2019-2020 school year.

Task 1, Step 4; Community organizations that serve LEP persons

Iowa City Transit and MPOJC have current associations with local social service organizations, the Iowa City Community School District, Kirkwood Community College, and the University of Iowa and their International Student and Scholar Services (ISSS) center. All these organizations provide service for persons speaking limited English.

Task 1, Step 4A; Identify community organizations

LEP persons are served mainly by the University of Iowa's ISSS center Kirkwood Community College and local social service organizations that support immigrant and refugee populations.

Task 1, Step 4B; Contact relevant community organizations

Iowa City Transit in collaboration with MPOJC has developed a working relationship with the University of Iowa's ISSS center for language assistance services. ISSS has agreed to assist the local transit agencies in Johnson County by distributing transit program information to international students and scholars.

Task 1, Step 4C; Obtain information

Working through the MPO, Iowa City Transit will continue to reach out to LEP persons and organizations in order to gather relevant information and provide transit information.

**Factor 2:** Frequency with which LEP individuals come into contact with transit programs, activities, and services.

Task 2, Step 1; Review the relevant programs, activities, and services you provide

Iowa City Transit provides service on 13 regular routes from 5:50 a.m. – 10:45 p.m. All routes operate daily with 15-minute service on the Downtown Shuttle, 20-minute service on the Court Street, Lower Muscatine, and Towncrest routes, and 30-minute service on the South Iowa City, Oakcrest, and West Iowa City routes on weekdays during peak periods and over the midday off-peak period. Each of the Peninsula, North Dodge, Rochester, Highway 1, and South Gilbert routes operate with 30-minute service during peak periods and 60-minute service during the midday off-peak period. The Eastside Loop operates when Iowa City schools are in session. Evening service is from 6:30 p.m. – 10:15 p.m. with the South Iowa City, Peninsula, North Dodge, West Iowa City, Rochester, Highway 1, and South Gilbert routes operating on an hourly schedule. The Court Street, Lower Muscatine, and Towncrest routes operate with a 40-minute service and the Oakcrest remains on 30-minute service during the evenings. Saturday service operates all day following the weekday evening schedules for each route with service ending at 7:40 p.m., except for the Eastside Loop and Downtown Shuttle, which do not operate evenings and weekends. There is no fixed route service on Sundays. During peak periods Iowa City Transit operates 21 buses at maximum service. Sixteen buses operate weekdays off-peak. During evening hours and on Saturdays, 9 buses are in service. The Downtown Iowa City Transit Interchange is the hub of

Iowa City Transit's operations. All regular routes arrive and depart at the interchange except for the Eastside Loop, allowing for coordinated transfers between buses.

Iowa City Transit began piloting fare-free service on all routes on August 1, 2023. While it was initially scheduled as a 2-year pilot program, Iowa City Transit plans to continue operating as a fare-free system for the foreseeable future. In August 2025, during a regularly scheduled meeting, the Iowa City City Council expressed their support to continue to provide fare free service and approved staff's recommendation to remove fare boxes from all Iowa City Transit revenue vehicles.

All Iowa City Transit fixed route buses are lift/ramp-equipped. Demand responsive paratransit service is provided during fixed-route service hours operated by Johnson County SEATS.

There are many places where Iowa City transit riders and members of the LEP population can come into contact with Iowa City Transit services. An important part of the development of Iowa City Transit's language assistance program is the assessment of major points of contact, including:

- The use of bus service
- Communication with customer service staff
- Bus pass sales
- Printed outreach materials
- Web-based outreach materials
- Public meetings
- Transit app
- Local news media
- Audio announcements

Amongst Transportation Services staff, four drivers and one maintenance team member speak Spanish, four drivers speak fluent French, two drivers speak fluent Swahili, one driver speaks fluent Hindi, Urdu, and Punjabi, one driver speaks fluent Kifuliru, Cimbema, and Lingala in addition to French and Swahili.

Iowa City Transit employees indicate that encounters with customers who were unable to communicate in English are very rare.

**Table 1: Transportation Services Languages Spoken**

Language	Driver	Support Staff
Spanish	4	1
French	4	
Swahili	2	
Punjabi	1	
Hindi	1	
Urdu	1	
Bamana	1	
Italian	1	
Lingala	1	
Japanese	1	
Ewe	1	
Cibema	1	

Task 2, Step 2; Review information obtained from community organizations

Through public input and planning sessions, Iowa City Transit has discovered that most community organizations want more transit or transportation service related to jobs, education, day care, and health care and have identified very few LEP issues.

Task 2, Step 3; Consult directly with LEP persons

LEP persons were consulted through the local planning process.

**Factor 3:** Assess the nature and importance of the program, activity, or service provided by the program

Task 3, Step 1; Identify your agencies most critical services

Using public transportation is important to LEP persons as indicated from discussions with local groups and the University of Iowa. Iowa City Transit's most critical services include:

- Fixed route services
- Paratransit services
- Coordination with other public transit agencies in the urbanized area

If limited English is a barrier to using these services then the consequences for the individual are serious, including limited access to obtain health care, education, or employment. Critical information from Iowa City Transit which can affect access includes:

- Route and schedule information
- Fare and payment information
- System rules
- Information about how to ride
- Public service announcements
- Safety and security
- Complaint forms
- Communication related to transit planning
- Information regarding paratransit services

An example of Iowa City Transit's interior bus signage is included in Attachment F.

Task 3, Step 2; Review input from community organizations and LEP persons

Iowa City Transit has received very little input from the community regarding problems with language barriers.

**Factor 4:** Assessing the resources available to the recipient and costs

Task 4, Step 1; Inventory language assistance measures currently being provided, along with associated costs

Iowa City Transit provides the following language assistance measures to date:

- Multilingual 24-hour telephone service
- Language Line available on website



- Identified employees that speak a language other than English
- Transit information on website can be translated into 95 different languages using built-in Google Translator tool
- Transit app available in English, French, Spanish, Italian, German, Portuguese and Dutch

Cost for these measures is under \$1500 annually.

Task 4, Step 2; Determine what, if any additional services are needed to provide meaningful access

Iowa City Transit will focus on the following service improvements:

- Translation of critical printed information including bus schedules, Paratransit application, Riders Guide, and Reasonable Modification Request form
- Translate Iowa City Transit service map into Chinese, French, Arabic, and Spanish.

Task 4, Step 3; Analyze your budget

Like most public agencies, Iowa City Transit's budget is constrained by several factors and staff resources are also limited. Devoting more resources to printing, webpage design, signage, and additional administrative costs are included in future transit budgets.

Task 4, Step 4; Consider cost effective practices for providing language services

Iowa City Transit will continue to work with the community and the university to provide cost effective practices including researching and pursuing language assistance products and translation services developed and paid by local, regional, and state government agencies.

## **B. Developing a Language Assistance Plan**

### **a. Results of Four Factor Analysis:**

The City of Iowa City is part of the Iowa City Urbanized Area that includes a large university with over 32,000 students. Because of the University, many international students and faculty live in the Iowa City urbanized area creating the potential for language issues. As identified in the four-factor analysis, both the Hispanic/Latino and the Asian/Pacific Island populations were identified as needing language assistance since their populations were each over 5% of the total population in Iowa City. Because of the diversity of the Asian/Pacific Island population, Iowa City Transit approached the University of Iowa's International Student and Scholar Services to assist in identifying the top Asian/Pacific Island languages within the University system that may require language assistance. Chinese was identified as the top Asian/Pacific Island language. As a result, Iowa City Transit will continue to translate critical documents in Chinese and Spanish and make them available in hardcopy or Iowa City Transit's website. Bus schedules have been available in Spanish, French, English, Arabic, and Chinese since 2021.

### **b. Language Assistance Services by Language:**

The following measures have or will be implemented to ensure LEP persons have adequate access to transit information:

- Iowa City Transit has identified any employees who speak a language other than English. For those employees who are able and willing to provide translation services, their services will be called upon as needed during fixed route service hours to interpret and assist LEP individuals.
- The City of Iowa City has a multilingual 24-hour telephone service, the Language Line. The Language Line is a three-way call translation service that can translate numerous languages. Language Line Services provides a sheet which lists the languages available for translation assistance. The language sheet can be used by transit agency staff to determine the language spoken by an LEP individual.
- In 2022, the Iowa City Transit website was updated to allow for quick and easy translation of general transit information into approximately 95 different languages using Google Translate.
- Translation of critical printed information including Paratransit application, Title VI Notice, Title VI Complaint Process and Form, Riders Guide, and Reasonable Modification Request form into Spanish and Chinese.

### **c. Notice to LEP Persons:**

Iowa City Transit will provide general public transit information, trip planning instructions using the Transit app and Google transit, and translated route and schedule information via the Iowa City Transit website.

Handouts will be made available that contain information on language assistance services as well as a summary of important transit information and instructions for downloading the information from the website in another language.

The City of Iowa City also utilizes the Language Line Services for translation of languages that are not English. Language Line Services are free to the user and interpreters from English into more than 170 languages and are accessible 24 hours a day, 7 days a week. Those seeking language assistance can visit the transit office and work with a customer service representative using language identification cards to inform us as to which language they speak. The individual needing language assistance can point at a language on the identification card which includes a message stating, "Point to your language". An interpreter will be called. The interpreter is provided at no cost to you.

d. Monitor, Evaluate and Update Language Access Plan:

All language assistance programs and procedures will be evaluated on an annual basis. The following will be monitored and reviewed annually:

- The number of documented LEP persons encountered
- How the needs of the LEP persons were addressed
- Determine whether local language assistance programs have been effective
- Determine if any changes in the level of assistance available on our website or through our

Each encounter with an LEP person will be recorded by the bus driver/office is reported directly to the Transportation Services Director.

The Title VI/LEP Plan includes a link to the Title VI/LEP Plan on the Iowa City Transit website at:

<https://www.iowa-city.org/WebLink/browse.aspx?id=1472428&dbid=0&repo=CityofIowaCity>

Any person or agency with internet access will be able to access and download the plan from the above-referenced website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which will be provided if feasible.

e. Employee Training:

Current and incoming employees will be trained on the policies and procedures of the language assistance program. Staff would have the necessary information provided to them to assist LEP individuals. The following information will be available to assure staff can adequately assist LEP persons:

- Information on Title VI Policy and LEP responsibilities
- Description of language assistance services offered to the public
- Contact information of chosen bilingual staff who have agreed to assist in translation services
- Documentation of language assistance requests
- Use of the Language Line Services

- How to handle a potential Title VI/LEP complaint

**C. Safe Harbor Provision**

As identified in the four-factor analysis, Iowa City Transit identified Spanish speakers (1,756 households) and Asian and Pacific Island speakers (1,735 households) as requiring language/written materials assistance. The Asian language speakers were also identified in the analysis of the University population. Information regarding translation services for these populations is included on the Iowa City Transit.

### **DIVERSITY ON PLANNING AND ADVISORY BODIES**

Iowa City Transit is part of the City of Iowa City which has an elected City Council to oversee Iowa City Transit activities. The Mayor and one City Councilor are Black while the remaining Councilors are Caucasian. There are a total of 3 women and 4 men on the Iowa City City Council.

Johnson County SEATS, a paratransit subrecipient to Iowa City Transit, has a 7-member advisory committee including Iowa City representatives. All current members of this advisory committee are Caucasian. This committee meets quarterly.

### **ASSISTANCE TO SUBRECIPIENTS**

Johnson County SEATS, a paratransit subrecipient to Iowa City Transit, by contract requires SEATS to comply with their Title VI Program and to report any Title VI complaints. As primary recipient, Iowa City Transit will provide the following information to Johnson County SEATS:

- Sample notices to the public informing beneficiaries of their rights under DOT's Title VI regulations, procedures on how to file a complaint, and the recipient's Title VI complaint form.
- Sample procedures for tracking and investigating Title VI complaints filed with a subrecipient, and when the primary recipient expects the subrecipient to notify the primary recipient of complaints received by the subrecipient.
- Demographic information on the race and English proficiency of residents served by the subrecipient. This information will assist the subrecipient in assessing the level of service it provides to the community and in assessing the need for language assistance.
- Other information will be provided at quarterly meetings with the transit systems in the Iowa City urbanized area.

### **MONITORING SUBRECIPIENTS**

In order for Iowa City Transit to ensure compliance with Title VI requirements by a subrecipient, Iowa City Transit shall undertake the following activities:

- Document its process for ensuring that all subrecipients are complying with the general reporting requirements, as well as other requirements that apply to the subrecipient.
- Collect Title VI Programs from subrecipients and review programs for compliance.
- At the request of FTA, in response to a complaint of discrimination, or as otherwise deemed necessary by the primary recipient, the primary recipient shall request that subrecipients who provide transportation services verify that their level and quality of service is provided on an equitable basis.
- Iowa City Transit will meet annually with Johnson County SEATS to ensure compliance.

### **DETERMINATION OF SITE OR LOCATION OF FACILITIES**

The future Iowa City Transit Operations and Maintenance Facility is in the design stage after a 2023 Low/No Emissions Award for a new facility and four replacement electric buses. We expect to commence revenue operations in the new facility by 2029. This facility will be built on property currently owned by the City of Iowa City.

**Attachment A: 2024 Certifications and Assurances**

\*\*FY2025 Certifications and Assurances not yet available at the time of writing this document

Certifications and Assurances

Fiscal Year 2024

**FEDERAL FISCAL YEAR 2024 CERTIFICATIONS AND ASSURANCES FOR FTA  
ASSISTANCE PROGRAMS**

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Iowa City Transit

The Applicant certifies to the applicable provisions of all categories: (*check here*) \_\_\_\_\_.

*Or,*

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01 Certifications and Assurances Required of Every Applicant	<u>X</u>
02 Public Transportation Agency Safety Plans	<u>X</u>
03 Tax Liability and Felony Convictions	<u>X</u>
04 Lobbying	<u>X</u>
05 Private Sector Protections	<u>X</u>
06 Transit Asset Management Plan	<u>X</u>
07 Rolling Stock Buy America Reviews and Bus Testing	<u>X</u>
08 Urbanized Area Formula Grants Program	<u>X</u>
09 Formula Grants for Rural Areas	<u>N/A</u>
10 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	<u>N/A</u>
11 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	<u>X</u>

Certifications and Assurances		Fiscal Year 2024
		<u>X</u>
12	Enhanced Mobility of Seniors and Individuals with Disabilities Programs	<u>X</u>
13	State of Good Repair Grants	<u>N/A</u>
14	Infrastructure Finance Programs	<u>X</u>
15	Alcohol and Controlled Substances Testing	<u>X</u>
16	Rail Safety Training and Oversight	<u>N/A</u>
17	Demand Responsive Service	<u>N/A</u>
18	Interest and Financing Costs	<u>N/A</u>
19	Cybersecurity Certification for Rail Rolling Stock and Operations	<u>N/A</u>
20	Tribal Transit Programs	<u>N/A</u>
21	Emergency Relief Program	<u>X</u>

**CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE**

**AFFIRMATION OF APPLICANT**

Name of the Applicant: City of Iowa City

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

The Certifications and Assurances the Applicant selects apply to each Award for which it now seeks, or may later seek federal assistance to be awarded by FTA during the federal fiscal year.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute



## Certifications and Assurances

Fiscal Year 2024

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature  Date: 4/1/24

Name Geoff Fruin, City Manager Authorized Representative of Applicant

## AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): \_\_\_\_\_

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature  Date: 4/1/24

Name Eric Goers, City Attorney Attorney for Applicant

*Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.*

## Attachment B: Iowa City City Council Resolution Approving Title VI

Prepared by: Darian Nagle-Gamm, Director of Transportation, 1200 S. Riverside Drive, Iowa City, IA 52245  
319-356-5156

RESOLUTION NO. \_\_\_\_\_

### Resolution Approving the Iowa City Transit Title VI and Limited English Proficiency Plan

WHEREAS, Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin by agencies such as Iowa City Transit in any programs and activities that receive federal funds; and

WHEREAS, the Federal Transit Administration (FTA) requires adoption, and renewal every three years of a transit-specific Title VI Program and Limited English Proficiency Plan for Transit operations receiving federal funding; and

WHEREAS, the City should rescind the Title VI Program Plan for Iowa City Transit adopted in 2019, and adopt the attached, revised plan to ensure compliance with Title VI and similar federal laws prohibiting discrimination in the use of federal funds.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF IOWA CITY, IOWA, THAT:

1. The attached Title VI and Limited English Proficiency Program Plan for Iowa City Transit is approved.

Passed and approved this 1<sup>st</sup> day of April, 2025.

\_\_\_\_\_  
MAYOR

Approved by

ATTEST: \_\_\_\_\_  
CITY CLERK

\_\_\_\_\_  
City Attorney's Office

It was moved by \_\_\_\_\_ and seconded by \_\_\_\_\_ the Resolution be adopted, and upon roll call there were:

AYES:

\_\_\_\_\_  
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NAYS:

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ABSENT:

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\_\_\_\_\_ Alter  
\_\_\_\_\_ Bergus  
\_\_\_\_\_ Harmsen  
\_\_\_\_\_ Moe  
\_\_\_\_\_ Salih  
\_\_\_\_\_ Teague  
\_\_\_\_\_ Weilein

## Attachment C: Iowa City Transit Title VI Complaint Form

### IOWA CITY TRANSIT TITLE VI COMPLAINT FORM

This form may be used to file a complaint with the City of Iowa City based on violations of Title VI of the Civil Rights Act of 1964. You are not required to use this form, a statement that provides the same information may be provided to submit your complaint. Complaints must be submitted 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): \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Date(s) of alleged discrimination:

Date Discrimination began \_\_\_\_\_

Last or most recent date \_\_\_\_\_

ALLEGED DISCRIMINATION:

If your complaint is in regard to discrimination in the delivery of services or discrimination that involved the treatment of you by others by the agency or department indicated above, please indicate below the basis on which you believe these discriminatory actions were taken.

_____ Race	_____	_____	_____
_____ Color	_____	_____	_____
_____ National Origin	_____	_____	_____

Explain:  
Please explain as clearly as possible what happened. Provide the name(s) of witness(es) and others involved in the alleged discrimination. (attach additional sheets if necessary and provide a copy of written materials pertaining to your case).

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

*Note: The City of Iowa City prohibits retaliation or intimidation against anyone because that individual has either taken action or participated in action to secure rights protected by policies of the City. Please inform the Iowa City Civil Rights Office if you feel you were intimidated or experienced perceived retaliation in relation to filing this complaint.*

## **Attachment D: Title VI Contract Language for Transit Projects**

### **TITLE VI CONTRACT LANGUAGE**

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

#### **1. Compliance with Regulation**

The contractor shall comply with the regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter referred to as DOT), Title 49, Code of Federal Regulations, part 21 (hereinafter referred to as the Regulations), as they may be amended from time to time, herein incorporated by reference and made part of this contract.

#### **2. Nondiscrimination**

The contractor, with regard to the work performed during the contract, shall not discriminate on the grounds of race, color, sex, or national origin in the selection of and retention of subcontractors, including procurement of materials and leases of equipment. The contractor shall not participate either directly or indirectly in discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

#### **3. Solicitation for Subcontracts, including Procurement of Materials and Equipment**

In all solicitations whether by competitive bidding or negotiations made by the contractor for work to be performed under a subcontract, including the procurement of material for leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulation relative to nondiscrimination on the grounds of race, color, sex, or national origin.

#### **4. Information and Reports**

The contractor shall provide all information and reports required by the Regulation or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information and its facilities as may be determined by the City of Iowa City, Iowa Department of Transportation or appropriate Federal Agency to be pertinent to ascertain compliance with such Regulation, orders and instructions. Where any information required of contractors in exclusive possession of another who fails or refuses to furnish this information, the contractor shall so certify to the Iowa Department of Transportation or the appropriate Federal Agency as needed, and shall set forth what efforts it has made to obtain the information.

## 5. Sanctions for Noncompliance

In the event of the contractor's noncompliance with the nondiscrimination provisions of this contract, the City of Iowa City shall impose such contract sanctions as the Iowa Department of Transportation may determine to be appropriate, including, but not limited to:

- Withholding of payments to the contractor under contract until the contractor complies and/or
- Cancellation, termination, or suspension of the contract, in whole or in part.

## 6. Incorporations of Provisions

The contractor shall include the provisions of paragraphs (1) through (5) in every subcontract, including procurement of materials and leases of equipment, unless exempt by Regulations or directives issued pursuant thereto. The contractor shall take such action with respect to any subcontractor or procurement as the City of Iowa City, Iowa Department of Transportation, or appropriate Federal Agency may direct as a means of enforcing such provisions, including sanctions for noncompliance.

**Attachment E: Notice of Title VI Provisions**

CITY OF IOWA CITY

# ***NOTICE***

## **OF TITLE VI PROVISIONS**

The City of Iowa City (Iowa City Transit) operates its programs and services in compliance with the FTA Circular 4702.1B and Title VI of Civil Rights Act of 1964, which states, no person in the United States shall, on the grounds of race, color, and 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.

Any person who believes she or he has been aggrieved by unlawful discriminatory practice under Title VI may submit a complaint with Iowa City Transit. The Civil Rights Restoration Act of 1987 amended Title VI to specify that entire institutions receiving Federal funds, whether schools, colleges, government entities, or private employers must comply with Federal civil rights laws, rather than just the particular programs or activities that receive federal funds.

If you feel you are being denied participation and/or benefits in this program, or otherwise being discriminated against because of your race, color, or national origin, or would like more information on Iowa City Transit's civil rights program and the procedures to submit a complaint you may contact:

City of Iowa City  
Civil Rights Office  
410 East Washington Street  
Iowa City, Iowa 52240  
319-356-5022  
<http://www.icgov.org/default/?id=1515>

Iowa Department of Transportation  
Office of Employee Services – Civil Rights  
800 Lincoln Way, Ames, Iowa 50010  
Iowa DOT: 800-262-0003  
Civil Rights Commission: 800-457-4416

A complainant may submit a complaint directly with the Federal Transit Administration (FTA) Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

YOU SHOULD CONTACT THE ABOVE INDIVIDUALS AS SOON AS POSSIBLE BUT NO LATER THAN 180 DAYS AFTER THE ALLEGED DISCRIMINATION OCCURRED, OR IF THERE HAS BEEN CONTINUING COURSE OF CONDUCT, NO LATER THAN 180 DAYS AFTER THE ALLEGED DISCRIMINATION WAS DISCONTINUED.

This notice will be available on the Iowa City Transit website, on Iowa City Transit buses, and at the Iowa City City Hall.

Esta notificación estará disponible en el sitio web Iowa City Transit, en Iowa City autobuses de tránsito, y en las instalaciones de Tránsito Iowa City.

此通知将可在在科勒尔维尔交通网站，科勒尔维尔公交车，并在的科勒尔维尔交通设施。

If information is needed in another language, contact 319-356-5022.





**Attachment F: Title VI Notification**

# **TITLE VI – YOUR RIGHTS**

**Title VI of the 1964 Civil Rights Act** requires that “No 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 financial assistance.”

**It shall be against the policy of Iowa City Transit to discriminate against an individual based upon that person's race, color or national origin. If you believe you have been subjected to discrimination you may file a complaint with the Iowa City Human Rights Coordinator.**

\*Complaints must be filed within 180 calendar days from the date of the alleged incident.

*For more information visit us on the web at [www.icgov.org](http://www.icgov.org) or call Iowa City's Human Rights Coordinator, Stefanie Bowers @ 319-356-5022.*  
欲了解更多信息，请访问我们的网站：[www.icgov.org](http://www.icgov.org)，或致电爱荷华市的人权协调员，孙燕姿鲍尔斯319-356-5022。

Para obtener más información, visítenos en la web en [www.icgov.org](http://www.icgov.org) o llame al Coordinador Humanos Iowa City derechos, Stefanie Bowers @ 319-356-5022.

## Attachment G: Service Standards and Policies

# Iowa City Transit

## SERVICE STANDARDS AND POLICIES

### SYSTEMWIDE SERVICE STANDARDS

To prevent discriminatory service design or operation, the FTA circular requires transit agencies to adopt system wide service standards and system wide service policies (policies are discussed later in this section). System wide service standards are required for the following criteria:

- Vehicle Load
- Vehicle Headway
- On-time performance
- Service Availability

### VEHICLE LOAD

To ensure Iowa City Transit customers can gain access to public transit services while balancing customer comfort, loading standards must be established and schedules devised that reflect customer volumes. This standard is measured as the ratio of customers on board to the seated bus capacity expressed as a percent. Values of 100 percent or less indicate all riders are provided a seated ride while values above 100 percent indicate standees. The following loading standard indicates the degree of crowding (i.e., standees) that is acceptable based on bus type and manufacturer's recommendation for safe, maximum loading capacity. These standards reflect standees in the center portion of the bus only, not in the stairwells. For ridership consistently above these standards below, Iowa City Transit will place a second bus on the trip.

**Standard:** Acceptable load factors should never consistently exceed the following: (Industry Standard: 125-150% in urban areas, 175% in university systems)

Bus Type	Vehicle Load Standard		
	Seated Capacity	Total Customers	Percentage
Standard 40' Bus	38-45	67-79	175%

Iowa City Transit experiences heavy demand on a daily basis as a result of providing service on a university campus. It operates a uniform fleet of 40' buses. This has resulted in the addition of "helper buses" to address capacity concerns.

### VEHICLE HEADWAY

Vehicle headway (the time interval between two vehicles traveling in the same direction on the same route) standards at Iowa City Transit relate to frequency of service. This standard is one of the commonly applied measures of transit adequacy, particularly from the customer's point of

view. Consequently, it can be one service characteristic that is the cause of customer dissatisfaction. In general, frequencies or "headways" (i.e., the time from one bus to the next at the same location) are established to provide enough vehicles operating past bus stops on a route to accommodate the customer volume and to stay within the recommended loading standards, which were discussed previously. If customer loads are light enough that more time is needed between vehicles to meet loading standards, then headways should be set on clock-face headways operating at 30 and 60-minute intervals.

**Standard:** For periods in which service is operated, the standard **minimum** headways by type/time of service are as follows. (Industry Standard: Varies)

Service Type/Time	Weekday		Saturday	Sunday
	Base	Night		
<b>Weekday</b>	30-minute	60-minute	---	---
<b>Evening</b>	---	60-minute	---	---
<b>Saturday</b>	---	---	60-minute	---

The definition of the above service types/times is as follows:

**Weekday.** Routes operated generally from 5:45 a.m. to 6:30 p.m., Monday-Friday.

**Weekday Night.** Routes operated generally from 6:30 p.m. to 11:00 p.m., Monday-Friday.

**Saturday.** Routes operated generally from 6:45 a.m. to 7:40 p.m.

**Sunday.** Iowa City Transit does not operate fixed route service on Sunday.

As with all standards, this headway matrix should be considered a guide, not an absolute measure.

## ON-TIME PERFORMANCE

Published timetables must provide the transit customer with a reasonable guarantee that the scheduled service will operate, and will, additionally, operate on time. The dependability of Iowa City Transit is important to people who typically plan trips around the availability of bus service. Moreover, customers associate a time penalty with unreliable bus service that reduces the attractiveness of public transportation. There are several ways to measure Iowa City Transit's dependability. The first is whether service operates at all. Measures of actual versus scheduled service (missed trips) are expressed as the percentage of scheduled trips that are actually made. Iowa City Transit should have sufficient spare buses and bus drivers to assure that the standard is met.

**Standard:** For Iowa City Transit, the missed trip standard is established at 99.0 percent. (Industry Standard: 90-95%)

On-time performance is also examined in terms of schedule adherence, which means the difference between scheduled time and the time the bus actually passes a particular location. The schedule adherence standard consists of two parts: 1) the definition of on time, and 2) the proportion of buses that operate within the on-time range. For purposes of establishing Iowa City Transit's on-time performance, "on-time" is established at zero minutes early to 7 minutes late. This allows the bus reasonable latitude for encountering general delays due to traffic, weather or other on-route delays, without unduly inconveniencing customers. Scheduled buses should never be early, for this would cause customers to miss the bus entirely and subject many riders to an even longer wait for the next scheduled bus. However, Iowa City Transit operates a significant number of "helper buses" to address capacity issues. "Helper Buses" provide the additional capacity needed to carry the number of people waiting for the scheduled bus. These buses are not considered when calculating the system wide on-time performance of the buses as they are used to assist the scheduled bus.

**Standard:** The standard for Iowa City Transit's schedule adherence is established at 75% of scheduled trips system wide. Therefore, 15 out of every 20 scheduled bus trips should be considered "on-time" according to the standard. (Industry Standard: 73-75%)

## **SERVICE AVAILABILITY**

A transit system inevitably receives many requests for service from citizens who are not within walking distance of a route, or who desire buses operating in their neighborhoods connecting with different destinations. Since transit resources are limited, it is unlikely that everyone will be accommodated to a satisfactory degree. Therefore, it is necessary to determine how to allocate the available resources to provide the best possible service. In developing measures for Iowa City Transit service, this standard has been divided into three separate components that reflect travel concentrations, trip purpose, and the need for bus service. The three components are:

- Production End representing the trip end that produces travel
- Attraction End that attracts travel
- Bus Stop Spacing

**Production End.** Determination of which residential neighborhoods should be candidates for service is a function of reasonable walking distance. Numerous studies have indicated that the maximum distance an average person can reside from a bus route and still be considered to "have service" is approximately one-quarter mile, which is roughly equivalent to a five-minute walk.

**Standard:** The standard will be 85% of the population within ¼ mile walking distance between home and an Iowa City Transit bus stop or attraction. (Industry Standard: ¼ mile, 85-90%)

This route coverage guide is just that-a guide. It is not an exact measurement. In some areas, the street pattern is not uniform or major generators are further apart than the guide indicates. Iowa

City Transit's service may not and should not conform to the guide in all areas due to other factors such as population density and operational hours compared to destination.

**Attraction End.** Major traffic generators in the Iowa City community create a transit opportunity.

**Standard:** Iowa City Transit will apply the following standards when considering service modifications.

- **Hospitals/Nursing Homes.** These usually do not attract a large number of trips. These facilities do, however, often serve those who depend on transit. Therefore, institutions of 100 or more beds may be considered candidates for Iowa City Transit service. (Industry Standard: None Found)
- **Colleges/Schools.** Students in a university community often comprise a major segment of the transportation dependent population. For this reason, colleges and post-secondary schools have been included in the availability standard. Those institutions with an enrollment of at least 1,000 students warrant consideration for service. (Industry Standard: None Found)
- **Shopping Centers.** Shopping trips constitute a major reason for transit travel. Shopping centers with more than 100,000 square feet of leased retail space are large enough to warrant consideration for Iowa City Transit service. Mixed-use retail, housing and office complexes can also be included within this category. (Industry Standard: None Found)
- **Social Service/Government Centers.** Public Agencies, government centers and community facilities attract significant traffic volume. While the nature and size of these facilities varies greatly, it can be generally stated that those serving at least 100 clients daily warrant consideration for public transit service. (Industry Standard: None Found)

### **Bus Stop Spacing**

While route alignments are the primary determinants of transit availability, a second influence on the proximity of transit is the bus stop spacing along these routes. Obviously, stops at every intersection provide the shortest walking distance to the bus, but may not be warranted based on other considerations. Therefore, a bus stop spacing standard must consider service area density and land characteristics served. Using these criteria, Iowa City Transit has developed two categories, Campus and Non-Campus, and established standards for each.

**Standard:** The general bus stop spacing standard for Iowa City Transit is summarized below: (Industry Standard: Varies, most far-sided)

### Bus Stop Spacing Standard

Location	Stop Spacing
Campus	Every other building
Non-Campus	Every ¼ mile

It should be noted that in some instances, the bus stop spacing standard should be discarded in favor of simply considering the location of customer concentration. This is especially true for stops that serve major activity centers or high-density residential locations.

The exact placement of a bus stop in the area of a signalized intersection is also a matter of concern. Generally, far-sided bus stops will be the Iowa City Transit standard unless determined, on a case-by-case basis, that other factors, such as business ingress/egress or congestion issues, dictate otherwise.

## SYSTEMWIDE SERVICE POLICIES

The FTA circular requires system wide service policies for distribution of transit amenities, vehicle assignment and for transit security. Policies differ from standards in that policies are not necessarily based on a quantitative threshold and are actions or procedures as opposed to standards that are rules or principles.

### DISTRIBUTION OF TRANSIT AMENITIES

Title VI circular requires that Iowa City Transit maintain service standards for the distribution of various transit amenities, including bus shelters, benches, route map/timetable, and trash receptacles owned by Iowa City Transit. There are several amenities that are placed at bus stops by private entities. These are not governed by these standards. The Iowa City Transit standard for each of these amenities is described below.

**Bus Shelters.** A major concern of transit riders, especially regarding inclement weather, is the amount of time spent on the street exposed to the elements. The abundance of cold and windy conditions is of particular concern in Iowa. The placement of shelters and the development of a priority location program are based upon the following:

- Number of boarding and/or transferring customers at a specific stop,
- Amount of shelter from the elements or lighting at or near the stop, and
- ADA considerations
- Safety concerns
- Customer comments received

**Policy:** Shelters should be provided at stops which serve 150 or more boarding daily and/or transferring customers or which serve concentrations of elderly or disabled residents. Shelters should be at least 5' by 8' and be enclosed on three sides. Service information including route numbers and colors, maps and schedules that serve the stop should be displayed. (Industry Standard: Varies)

**Benches.** Benches represent a medium level of amenity to provide greater comfort for Iowa City Transit customers.

**Policy:** Benches may be installed independently at bus stops that do not have shelters. For these benches, they should be placed facing the street, a minimum of 6 to 8 feet from the bus stop sign and anchored in place. (Industry Standard: None Found)

### **Digital Signage**

Iowa City Transit provides real-time vehicle tracking technology to assist customers in conveniently using the transit service. One of the techniques used to convey this information is through digital signs at the bus stop.

**Policy:** Iowa City Transit will increase digital signs at major transfer locations throughout its system.

**Route Map/Timetable.** Iowa City Transit's printed route map/schedule provides information for the general public at the bus stop where they will be boarding the bus.

**Policy:** Iowa City Transit's route map/timetables are provided in all shelters. They are also provided at major transfer points throughout the system. (Industry Standard: Shelters and Transfer Points)

**Trash Receptacles.** Trash receptacles are located only at bus stops with a larger number of boardings, usually in conjunction with a bus shelter.

**Policy:** Iowa City Transit provides trash barrels at shelters. (Industry Standard: None Found)

These standards are guidelines only in placement of amenities throughout Iowa City Transit's system. Not all bus stop locations are able to physically accommodate the amenities.

### **VEHICLE ASSIGNMENT**

Vehicle assignment refers to the process by which vehicles are placed into service on routes throughout the system. The following policy has been established.

**Policy:** Iowa City Transit has a uniform fleet consisting of 40' heavy-duty buses. Buses are rotated and randomly assigned to a route. (Industry Standard: Random with Exceptions for Route Geometrics and Lower Demand)

### **TRANSIT SECURITY**

Transit systems are required to develop security policies that will protect employees and the public against any intentional act or threat of violence or personal harm, either from criminal



activities or terrorist acts. In response to this requirement, Iowa City Transit provides the following security policy:

**Policy:** Iowa City Transit buses are equipped with two-way radios to communicate security concerns and security cameras as a method to after-the-fact review situations that may occur on the bus. All Iowa City Transit bus shelters will have nearby lighting to ensure customers security while waiting or exiting a bus. Additionally, all Iowa City Transit buses display signage educating customers on what to look for and do if they find a suspicious package. Also, all new bus drivers are provided with transit security training consisting of: warning signs, what to look for and procedures to follow in security situations. Finally, Iowa City Transit works with the Iowa City Police Department to simulate emergency situations on an Iowa City Transit bus. (Industry Standard: Larger systems have protocols for various emergency scenarios; smaller systems have language similar to the above.)