

**COUNTY OF
GRUNDY
“2023” TITLE VI PLAN**

**Grundy County
PO Box 127
22580 M Avenue
Grundy Center, Iowa, 50638
Phone 319-824-6912**

COUNTY of GRUNDY

TITLE VI POLICY STATEMENT

GRUNDY COUNTY assures that no person shall, on the grounds of race, color, national origin, or sex 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 the benefits of, or be otherwise subjected to discrimination under any program or activity. The County of Grundy further assures every effort will be made to ensure nondiscrimination in all its committees, programs and activities, regardless of the funding source.

The *GRUNDY COUNTY* will include Title VI language in all written agreements and bid notices and will monitor compliance.

The County Engineer of *GRUNDY COUNTY* will be responsible for initiating and monitoring Title VI activities, and all other responsibilities as required.




Gary J. Maier, Grundy County Engineer



Date



Vic Vandelaar, Chairperson (Vice)
Barbara L. Smith



Date

This Plan and Policy Statement were adopted at a regular Board of Supervisors meeting held on August 14, 2023.

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, national origin, or sex be excluded from participation in, be denied the 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).

TITLE VI COORDINATOR RESPONSIBILITIES

The County Engineer is responsible for ensuring the implementation and the day-to-day administration of *GRUNDY COUNTY* Title VI Plan. The County Engineer is also responsible for implementing, monitoring, and ensuring the County’s compliance with the Title VI regulations.

GENERAL RESPONSIBILITIES

A. Public Dissemination

GRUNDY COUNTY will disseminate Title VI Program information to County’s 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 County employees, utilization of Minority/Women/Disadvantaged Business Enterprises (DBE) contractors, public involvement and material acquisition.

C. Annual Reports

The County Engineer will be responsible for ensuring an annual report is prepared by August 1st of each year and submitted to Iowa DOT by September 1st of each year. The report will review Title VI accomplishments and goals for the upcoming year.

D. Remedial Action

The *GRUNDY COUNTY* 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 program’s 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 *GRUNDY COUNTY* involving Title VI issues, as any resolution.

FILING A COMPLAINT

Applicability

The complaint procedures apply to the beneficiaries of *GRUNDY COUNTY* programs, activities, including but not limited to the public, contractors, sub-contractors, consultants, employees, and other sub-recipients of federal and state funds.

Eligibility

If any individual, group or 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 *GRUNDY COUNTY ENGINEER and/or ATTORNEY*. Every effort will be made to resolve complaints informally at the agency, recipient and/or contractor level.

Time Limitation on Filing Complaints

Title VI complaints may be filed with:

- Grundy County
- Iowa Department of Transportation
- Federal Highway Administration
- U.S. Department of Transportation
- Iowa Labor Services Division

In all situations, *GRUNDY COUNTY* employees must contact the County Administrator 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, the date on which the conduct was discontinued.

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

A Title VI complaint form is available at the *GRUNDY COUNTY ENGINEER'S* office during normal business hours.

COMPLAINT PROCESSING

1. The County Engineer acting as the Title VI Coordinator 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 County.
2. The County Engineer will then investigate the complaint. If the complaint is against the County Engineer, then the Chairperson and/or Board of Supervisors or its designee will investigate the complaint. Additionally, a copy of the complaint will be forwarded to the County 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 County will also notify the Iowa Department of Transportation Office of Employee Services – Civil Rights of the investigation.
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 investigator's 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 County of Grundy has notified the Iowa Department of Transportation's Office of Employee Services/Civil Rights of its investigative report findings, the County will adopt a final resolution.
7. All parties will be properly notified of the outcome of the *GRUNDY COUNTY* investigative report.
8. If the complainant is not satisfied with the results of the investigation of the alleged discriminatory practice(s), she/he shall be advised of their right to appeal *GRUNDY COUNTY* decision. Appeals must be filed within 180 days after the County of Grundy's final resolution. Unless new facts not previously considered come to light, reconsideration of the County's determination will not be available.

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

**GRUNDY COUNTY
TITLE VI COMPLAINT FORM**

This form may be used to file a complaint with the County of Grundy based on violations of Title VI of the Civil Rights Act of 1964. You are not required to use this form, a letter that provides the same information may be submitted to file your complaint.

Name: _____ Date: _____

Street Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____ (cell/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 _____
Sex _____
Income Status _____

Religion _____
Age _____
Disability _____
Limited English Proficiency _____

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 material pertaining to your case).

Signature: _____

Date: _____

Note: GRUNDY COUNTY 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 County. Please inform the County Administrator if you feel you were intimidated or experience perceived retaliation in relation to filing this complaint.

APPENDIX A Receipt of Complaint Letter (sample)

Today's Date

Name

Address

City, State, Zip

Dear _____:

This letter is to acknowledge receipt of your complaint against the County of Grundy alleging _____.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 319-824-6912 or write to me at this address.

Sincerely,

**Title VI Coordinator
Grundy County Engineer
County of Grundy
PO Box 127
22580 M Avenue
Grundy Center, Iowa 50638**

**APPENDIX B Letter Notifying Complainant that the Complaint Is Substantiated
(sample)**

Today's Date

Name

Address

City, State, Zip

Dear _____:

The matter referenced in your letter of _____ (date) against the County of GRUNDY alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. **(If a hearing is requested, the following sentence may be appropriate.)** You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

**Title VI Coordinator
Grundy County Engineer
County of Grundy
PO Box 127
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