

Iredell County Council on Aging, Inc.

Title VI Program Document

(Adopted June 2023)

I. INTRODUCTION

The Iredell County Council on Aging (ICOA) receives federal and state financial assistance through the Federal Transit Administration (FTA) and the North Carolina Department of Transportation (NCDOT) Integrated Mobility Division (IMD).

In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, ICOA ensures that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity on the basis of race, color, national origin, or income status.

II. TITLE VI POLICY STATEMENT

ICOA is committed to ensuring that all programs, services, and benefits are administered without discrimination.

This commitment extends to employees, contractors, clients, and members of the public who interact with ICOA or its transportation providers.

Policy Statement:

“No person shall, on the grounds of race, color, national origin, or income, be excluded from participation in, denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The Executive Director serves as the Title VI Coordinator and ensures ongoing compliance with all federal and state civil rights requirements.

III. TITLE VI COORDINATOR CONTACT INFORMATION

Jennifer Barraclough, Executive Director

Title VI Coordinator

Iredell County Council on Aging, Inc.

344 E. Front Street, Statesville, NC 28677

Phone: (704) 873-5171

Email: jbarracough@iredellcoa.org

IV. TITLE VI COMPLAINT PROCEDURES

ICOA has established a written procedure for receiving, investigating, and resolving Title VI complaints:

1. **Filing a Complaint:** Any person who believes they have been discriminated against under Title VI may file a written complaint within 180 days of the alleged incident. Complaints

may be filed directly with the Executive Director/Title VI Coordinator at the address listed above.

2. Complaint Processing: The Executive Director will acknowledge receipt of the complaint within 10 business days and initiate an internal review. ICOA may coordinate with NCDOT's Office of Civil Rights if the complaint involves transportation services.

3. Investigation and Resolution: Investigations will be completed within 30 calendar days, and a written response will be issued to the complainant. ICOA will forward all Title VI complaints to NCDOT IMD and the NCDOT Office of Civil Rights within 24 hours of receipt, as required.

V. PUBLIC NOTICE OF RIGHTS UNDER TITLE VI

The Iredell County Council on Aging, Inc. operates its programs and services without regard to race, color, national origin, or income status in accordance with Title VI of the Civil Rights Act of 1964.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with:

Iredell County Council on Aging, Inc.

Attn: Title VI Coordinator

344 E. Front Street, Statesville, NC 28677

Phone: (704) 873-5171 | Email: jbarracclough@iredellcoa.org

Complaints may also be filed directly with:

North Carolina Department of Transportation (NCDOT)

Office of Civil Rights, Title VI Coordinator

1511 Mail Service Center, Raleigh, NC 27699-1511

VI. FIXED ROUTE SERVICE STANDARDS AND POLICIES

ICOA does not operate fixed-route public transit services. All transportation services are provided through a contracted demand-response system with ICATS (Iredell County Area Transportation System).

ICATS maintains its own FTA-compliant service standards, vehicle assignment policies, and Title VI program, approved by NCDOT and coordinated with ICOA. ICOA ensures compliance through regular monitoring, coordination meetings, and review of reports and complaints related to contracted transportation services.

VII. PUBLIC PARTICIPATION PLAN

ICOA encourages participation from all individuals, including minority, low-income, and LEP populations, in the planning and decision-making process.

Outreach activities include:

- Public meetings and Mooresville Roundtable discussions where transportation and aging-service needs are addressed with community leaders;
- Surveys and feedback opportunities at nutrition sites, where a significant portion of participants are minority and low-income older adults;

- Partnerships with local churches, civic groups, and community organizations to identify barriers and collect input from underserved populations; and
- Regular communication through newsletters, flyers, social media, and public comment opportunities.

All public notices and outreach materials include nondiscrimination language and contact information for the ICOA Title VI Coordinator to ensure inclusive participation and compliance with FTA and NCDOT requirements.

VIII. LIMITED ENGLISH PROFICIENCY (LEP) PLAN SUMMARY

ICOA complies with Executive Order 13166, ensuring access to services for persons with limited English proficiency.

Language assistance is available through bilingual staff, interpreter services, and translated materials (English and Spanish).

Public notices and complaint forms are available in both languages upon request.

IX. RECORD RETENTION AND TRAINING

ICOA retains all Title VI-related documentation, including complaints, reports, outreach activities, and training records, for a minimum of seven (7) years.

All staff receive Title VI and nondiscrimination training at orientation and during periodic updates.

X. TITLE VI NOTICE TO THE PUBLIC

Title VI Notice to the Public

The Iredell County Council on Aging, Inc. operates its programs and services without regard to race, color, national origin, or income in accordance with Title VI of the Civil Rights Act of 1964.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with the Iredell County Council on Aging or directly with the North Carolina Department of Transportation (NCDOT) Office of Civil Rights.

For more information or to file a complaint:

Iredell County Council on Aging, Inc.

Attn: Title VI Coordinator

344 E. Front Street, Statesville, NC 28677

Phone: (704) 873-5171 | Email: jbarracough@iredellcoa.org

A copy of the ICOA Title VI Plan and complaint form is available on the agency's website and at all ICOA facilities