

## GRTC TRANSIT SYSTEM



### TITLE VI PROCEDURES AND RECORD-KEEPING

Any individual may exercise his or her right to file a complaint with GRTC if that person believes that they (or any other program beneficiaries) have been subjected to unequal treatment or discrimination in the receipt of transit service. GRTC will make a concerted effort to resolve complaints using the agency's Nondiscrimination Complaint Procedures, as described below. All Title VI complaints and their resolution will be logged as described and reported with all program updates. Should any Title VI investigations be initiated by FTA, or any Title VI lawsuits be filed against GRTC, the agency will follow these procedures:

#### *Who takes discrimination complaints?*

- *Customer service and/or executive office staff may take in discrimination complaints. Other departments, (e.g. transportation, planning, and scheduling) and switchboard operators should direct/transfer calls to customer service for proper log-in.*

#### *How are discrimination complaints processed?*

- *Once Customer Service receives the discrimination complaint, the complaint is logged in a database under the category, "Discrimination/Title VI". The customer service director will forward all discrimination complaints to the Title VI Officer (the planning and scheduling director) for review.*
- *If executive office staff receives the discrimination complaint, the complaint is forwarded to the Title VI Officer. Planning staff will then log-in the complaint and notify Customer Service director of such action.*
- *All discrimination complaints will be logged into the customer service complaints database under the category "Discrimination/Title VI". GRTC will notify the alleging party within three days of the complaint's receipt. This notification initiates the review period.*

#### *How are discrimination complaints handled?*

- *Case investigation and documentation: The Title VI Officer will conduct a prompt investigation of each discrimination complaint filed and will develop a complete case record. A complete case record consists of the name and address of all parties interviewed/consulted and a summary of their statements, copies of summaries of pertinent documents, and a narrative summary of all evidence disclosed in the complaint investigation. It also includes the completed Title VI complaint form.*

- *A written report is to be prepared at the conclusion of the investigation and this shall include: summary of the complaint, description of the investigation, findings, and recommendations.*

*Disposition-approval and notice:*

- *The Title VI Officer will present recommendations to GRTC's Chief Operations Officer (COO) for approval of the disposition. If the complaint is determined to be valid, the recommendation will include proposed collective actions to address the situation. A resolution with no actions will be recommended if the complaint is found not valid or questionable.*
- *The Title VI Officer will notify the alleging party about the resolution to the complaint within 30 days of its receipt by the Title VI officer. Proper log of the resolution to the complaint will be kept on file.*

*Requests for consideration:*

- *The alleging party may submit a request for reconsideration within 30 days from the date the notice of disposition is issued.*
- *Appeals will be reviewed within 30 days of the dated request for reconsideration. The appeal will be heard by the Chief Executive Officer.*

*Monitoring*

- *The Title VI Officer, Planning Manager, and Customer Service Director will conduct a quarterly review of all Title VI complaints reviewed by GRTC. Corrective actions taken at the time of each resolution will be reviewed in these quarterly sessions. The Title VI Officer may waive the requirement of a quarterly meeting if no complaint or corrective action has been taken in the closing quarter.*

(Approved March, 2014)