

TITLE VI MONITORING AND ENFORCEMENT

Lawsuits/Complaints, Notice to Beneficiaries - GPMTD Procedures and Record keeping

Title VI Requirement, notice & purpose

All FTA recipients must meet the following program requirements, which have been established to conform to the Civil Rights Act of 1964 (Title VI):

The grantee must ensure that federally supported transit services and related benefits are distributed in an equitable manner with no discrimination on the grounds of race, color or national origin. No person shall be excluded from participating in, or denied the benefits of, or be subject to discrimination under any program, or activity receiving federal financial assistance.

The Department of Transportation (DOT) regulations implementing Title VI require collection of data and other information to enforce the statute. Furthermore, FTA has established a program of grantee reviews assessing compliance with all Title VI regulations. The review includes an evaluation of each agency's policies, procedures, and record-keeping.

One of the areas examined in the Title VI review is Lawsuits and Complaints. In this area, the items under review are the coordination and procedures for collection of complaints and the resolution / corrective actions followed on those complaints. Has a grantee received any Title VI complaints in the past three years? Does a grantee maintain a log of such complaints? How are such complaints identified and resolved? — are sample questions to be asked by the review team.

Following are GPMTD's procedures for logging, record-keeping and handling of Title VI complaints.

Procedures and record-keeping

Who takes discrimination complaints? Customer Service and/or Staff Assistants may take in discrimination complaints. Other departments (e.g. Operations, Marketing, and Scheduling) and switchboard operators should direct/transfer calls to Customer Service and/or Staff Assistants 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 Human Resource Specialist will forward all discrimination complaints to the Title VI Officer (the Program Development Director) for review.
- If Staff Assistants receives the discrimination complaint, the complaint is forwarded to Title VI Officer. Planning staff will then log-in the complaint.
- All discrimination complaints will be logged in under the category "Discrimination/ Title VI".

- GPMTD will notify the alleging party within five work 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. 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 GPMTD's General Manager (GM) for approval of the disposition. If the complaint is determined to be valid, the recommendation will include proposed corrective 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.

Request for reconsideration

- 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 General Manager.

Monitoring

The Title VI Officer and the General Manager will conduct a quarterly review of all Title VI complaints received at GPMTD. 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.

Adopted on March 9, 2009

Don Shay, Chairman, Board of Trustees,
GREATER PEORIA MASS TRANSIT DISTRICT

Arthur Bell, Secretary, Board of Trustees,

Greater Peoria Mass Transit District