

### **III. Title VI Complaint Procedure and Form**

#### **Receiving and Documenting Complaints**

Complaints via Phone Call: When a member of the public calls MVRTD and states that s/he wishes to file a Title VI complaint, the front desk will transfer the call to MVRTD's Title VI officer who will document the complaint using the Title VI Complaint Form (see below). Should the Title VI officer be unavailable to take the call, the front desk shall record the individual's contact information and state that the Title VI officer will call the person back. The Title VI officer shall call the individual back within five business days of receiving the message. If the Title VI officer will be out of the office longer than five business days, an interim Title VI officer shall be selected and s/he shall receive the Title VI complaints calls until the regular Title VI office returns.

In the event that an individual calls in a complaint but does not specifically state that s/he wishes to file a Title VI complaint and the call is forwarded to the Operations Department following normal (non-Title VI) complaint procedures, the person who takes the call shall follow the normal (non-Title VI) complaint documentation procedures. If after the call is taken, it becomes clear that the complaint involves Title VI, the Operations Department shall forward the person's contact information to the Title VI officer. The Title VI officer shall call the individual back and document the Title VI complaint using the Title VI Complaint Form.

Complaints via Email/Website: When a member of the public submits a complaint via email or through the MVRTD website that is related to Title VI, it should be forwarded to the Title VI officer by whichever staff member receives it. If the emailed complaint does not include sufficient information to fill out the Title VI Complaint Form, the Title VI officer will contact the individual to obtain the needed information. In all cases, the Title VI officer will reply to the individual to confirm receipt of the complaint.

The Title VI officer shall reply to the email within five business days. If the Title VI officer will be out of the office longer than five business days, an interim Title VI officer shall be selected and he/she shall be forwarded the Title VI complaints emails until the permanent Title VI office returns.

#### **Enter the Complaint into the MVRTD Title VI Complaint and Lawsuit Log**

Any Title VI complaint received by MVRTD shall be entered into the MVRTD Title VI Complaint and Lawsuit Log. The following information must be included in the log:

- Date the complaint was filed
- A summary of the allegations
- The status of the investigation
- Actions taken by the recipient in response

#### **Internal Investigation of Title VI Complaints**

After a Title VI complaint is received and fully documented using the Title VI Complaint Form, the Title VI officer will initiate an internal investigation of the complaint. Such an investigation might include, but is not limited to, speaking with administrative staff,

Maintenance Department staff, and/or Operations Department staff (including bus drivers), reviewing company policies and procedures, and evaluating service characteristics and schedules. If requested by the complainant or warranted based on the investigation, the Title VI officer will contact the complainant at the conclusion of the investigation to report on any findings or potential changes as a result of the complaint.

Notice shall include information regarding appeal rights of the complainant and instructions for initiating such an appeal. The first level of appeal is to the Executive Director of MVRTD. The Executive Director will review all of the facts of the case and the process of the internal investigation. If any aberrations from normal procedure are discovered or if new facts come to light, MVRTD will reconsider the determination.

If the complainant is still dissatisfied with the determination and/or resolution set forth by MVRTD, the result may be appealed to VTrans. Complainant will be advised to contact:

Vermont Agency of Transportation  
Office of Civil Rights & Labor Compliance  
219 North Main Street  
Barre, VT 05641  
Phone: (802) 249-9291  
Fax: (802) 479-5506

If the complainant is dissatisfied with the determination and/or resolution set forth by VTrans, the same complaint may be submitted to FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, Transportation Center, Kendall Square, 55 Broadway, Suite 920, Cambridge, MA 02142-1093.

#### **Update the MVRTD Title VI Complaint and Lawsuit Log**

After conducting the internal investigation, the Title VI officer must update the status of the complaint in the MVRTD Title VI Complaint and Lawsuit Log. This will include an explanation of any actions taken as a result of the complaint and/or internal investigation.

### **IV. Complaint and Lawsuit Log**

MVRTD has no active lawsuits at this time, and has received no Title VI complaints or lawsuits in the past three years.