

## Discrimination Complaint Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager. The complaint is to be filed in the following manner:
  - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
  - b. The complaint shall be in writing and signed by the complainant(s).
  - c. The complaint should include:
    - the complainant's name, address, and contact information
    - (i.e., telephone number, email address, etc.)
    - the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance).
    - a description of the alleged act of discrimination
    - the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
    - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
    - if known, the names and/or job titles of those individuals perceived as parties in the incident
    - contact information for any witnesses
    - indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)
  - d. The complaint shall be submitted to the Title VI Manager (Mrs. Marilyn Branch- Mitchell) for Senior Connections at 24 East Cary Street, Richmond VA 23219 **or** **[mmitchell@youraaa.org](mailto:mmitchell@youraaa.org)**.
  - e. Complaints received by any other employee of Senior Connections will be immediately forwarded to the Title VI Manager.
  - f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed, and the Information and Outreach Manager will assist the complainant in converting the verbal

allegations to writing.

2. Upon receipt of the complaint, the Title VI Manager will immediately:
    - a. notify DRPT (no later than 3 business days from receipt)
    - b. notify the Executive Director of Senior Connections who will notify the Board Chair, Authorizing Official.
    - c. ensure that the complaint is entered in the complaint database
  3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
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4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
  5. If DRPT has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
  6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
  7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
  8. The investigation may also include:
    - a. investigating contractor operating records, policies or procedures
    - b. reviewing routes, schedules, and fare policies
    - c. reviewing operating policies and procedures
    - d. reviewing scheduling and dispatch records
    - e. observing behavior of the individual whose actions were cited in the complaint
  9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
  10. The Title VI Manager will contact the complainant at the conclusion of the investigation, but prior to writing the final report, and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
  11. At the conclusion of the investigation and **within 60 days** of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing

Official, DRPT, and, if appropriate, Senior Connections legal counsel.

12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to DRPT in the event the complainant wishes to appeal the determination. This letter will be copied to DRPT.
13. A complaint may be dismissed for the following reasons:
  - a. The complainant requests the withdrawal of the complaint.
  - b. An interview cannot be scheduled with the complainant after reasonable attempts.
  - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
14. DRPT will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by Senior Connections. DRPT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.