

Title VI Complaint Procedure

Any person who believes she or he have been discriminated against on the basis of race, color, or national origin by LCG or our transit service provider may file a Title VI complaint by completing and submitting the LCG's Title VI Complaint Form or by calling LCG's Title VI/ADA Coordinator. The anti-discrimination protection also extends to the activities and programs of LCG's sub-recipients. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence). All complaints are logged and will be investigated according to federal standards.

Passengers using federally funded public transportation are entitled to equal access, seating and treatment. Under Title VI of the Civil Rights Act of 1964 (as amended) and related statutes, LCG must ensure that no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any federally funded program, activity or service it administers.

Complaints for alleged non-compliance with Title VI and related statutes with Lafayette Transit System.

To submit a complaint online, fill out the online compliant form. LCG's Title VI Complaint Form (English and Spanish) is located on the website:

www.ridelts.com

To submit a claim by mail, by phone or in person, please fill out the printable complaint form and mail/take to or call:

Lafayette Consolidated Government
101 Jefferson Street
Lafayette, LA 70501
Email: swilliams2@lafayettela.gov
Phone: (337) 291-8410
Fax: (337)291-8415

Individuals may also file complaints directly with the Federal Transit Administration (FTA) with the 180-day timeframe:

Federal Transit Administration (FTA)
Attention: Title VI Coordinator
East Building, 5th Floor - TCR 1200
New Jersey Avenue, SE
Washington, DC 20590

Complaints received by Lafayette Transit System will be assigned to the Title VI/ADA Coordinator for investigation in accordance with federal standards (28 CFR Part 35 and FTA Circular 4702.1B). After the complaint is processed, the Title VI/ADA Coordinator will respond

to the complainant and, if warranted by the investigation, take appropriate action. LCG, as the designated recipient of federal funds is responsible for monitoring this process.

Note: To request information about LCG Title VI Policy, please send an e-mail to swilliams2@lafayetteela.gov. To request information in alternative formats, please contact swilliams2@lafayetteela.gov or phone: 337-291-8410.

LCG has 30 days to investigate each complaint. If more information is needed to resolve the case, LCG may contact the complainant. Following the investigation of the complaint, a possibility of two letters will be sent to the complainant: a closure letter or a letter of finding. A closure letter states that there was not a Title VI violation; therefore, the case will be closed. A letter of finding states that there was a Title VI violation and explains what the corrective action will be taken to remedy the situation. A complainant can appeal the decision within 60 days of receiving the letter. All appeals must be submitted to LCG.

TRACKING

Complaint comes in and is logged and filed by the Title VI/ADA Coordinator.

Once complaint is received, the Title VI/ADA Coordinator will notify and send complaint to the Transit and Parking Manager within 24 hours. During the review process, the Title VI/ADA Coordinator will send out emails to Parking and Transit Manager and CAO to remind them that the complaint is not yet resolved or closed out. This process is reinitiated weekly to ensure timely compliance.

INVESTIGATING

1. Summary of the complaint, completed by the Title VI/ADA Coordinator.
2. Statement of issues. List every issue derived from the complaint summary. Include questions raised by each issue:
 1. Who?
 2. What?
 3. When?
 4. Where?
 5. How?

Add new issue that surface during investigation. The final list of issues becomes outline for investigation.

3. Respondent's replay to each issue. Obtain information from each respondent, listen to each tape, and review each document. All staff will document information collected in the customer contact (respondent area). After all respondent information is documented, complete the documentation (remaining step). Determine the action taken. Follow up with the customer.

Note: "Respondent" is not confined to the transit vehicle operator. "Respondent" is defined as any source of information that can contribute to the investigation, such as:

- Operator (interview/History)
- Radio/Dispatch
- GPS tracking software and programs
- Maintenance (Staff/Records)
- City Transit Staff
- Witnesses
- Complainant (Interview/History)
- Video (camera) and/or audio recordings
- Incident reports (supervisor, transit police, fare/security inspectors)
- Other transit employees
- Route history

1. Findings of fact. Investigate every "issue" (stated in the "statement of issues noted in step two). Separate facts from opinions.
2. Citations of pertinent regulations and rules. Develop list of all regulations, rules, policies, and procedures that apply to the investigation.

Title VI requirements

LCG's policies and service standards

3. Conclusions of law. Compare each fact from "findings of fact" to the list of regulations, rules, etc. Make decision on whether violation(s) occurred. List of violations become "conclusions of law".
4. Description of remedy for each violation. Specific corrective actions for each violation found. Include plans for follow-up checks. Do not conclude report with "no action taken". If no violations found, conclude the report in a positive manner. Review policies and procedures. Review Title VI provisions.

RESPONSE TO COMPLAINANT

Detailed summary of conversation with the complainant. Send copy of letter to complainant.

ACTION TAKEN

Must include specific corrective action for each violation found.

Include a follow-up action plan.

If no violations found, note policies and procedures, etc. reviewed with operator.

