

Title VI Complaint Procedures

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Valley Metro or our transit service provider may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form or by calling Valley Metro's Customer Service. This anti-discrimination protection also extends to the activities and programs of Valley Metro's third party contractors. Any such complaint must be filed within 180 days of the alleged discriminatory act (or latest occurrence). All complaints are logged into Valley Metro's Customer Assistance System (CAS) 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, Valley Metro 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 may be lodged with Valley Metro Customer Service.

To submit a complaint online, fill out the online complaint form. Valley Metro's Title VI Complaint Form (English and Spanish) is located on the website: <https://www.valleymetro.org/form/title-vi-complaint-form>

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

Regional Public Transportation Authority
4600 E. Washington St., Suite 101
Phoenix, Arizona 85034
Email: csr@valleymetro.org
Phone: (602) 253-5000
TTY: (602) 251-2039

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

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

Complaints received by Customer Service will be assigned to the appropriate staff member(s) for investigation in accordance with federal standards (28 CFR Part 35 and FTA Circular 4702.1B). After the complaint is processed, Customer Service will respond to the complainant and, if warranted by the investigation, take appropriate action. The City of Phoenix, as the designated recipient of federal funds for this region, is responsible for monitoring this process.

Note: To request information about Valley Metro's Title VI Policy, please send an e-mail to TitleVICoordinator@valleymetro.org. To request information in alternative formats, please contact Customer Service at csr@valleymetro.org or phone: (602) 253-5000, TTY: (602) 251-2039.

Valley Metro has 30 days to investigate each complaint. If more information is needed to resolve the case, Valley Metro 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 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 Valley Metro Customer Service.

TRACKING

Complaint comes in and is logged into the CAS system.

The Customer Service Administrator sends the complaint to the cities/transit provider for investigation and documentation within 24 hours. Complaint is returned to the Customer Service Administrator to ensure the information is complete and closes the complaint. Each cities administrator audits the complaints as well to ensure they meet the guidelines for Title VI.

The administrator reviews an outstanding weekly report identifying outstanding complaints. During the review process the administrator will send out notifications to the agency and a copy to the relevant city to remind the entity that the complaint is not yet resolved or closed out. This process is reinitiated each week to ensure timely compliance.

The administrator audits all completed Title VI complaints to check for accuracy and has complaint reopened by Customer Service administrator and sent back if not completed accurately.

INVESTIGATING

STEP ONE: Summary of the complaint, completed by the Regional Services Customer Relations staff.

STEP TWO: 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 issues that surface during investigation. The final list of issues becomes outline for investigation.

STEP THREE: Respondent's reply to each issue. Obtain information from each respondent, listen to each tape, 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 steps). 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/OCC reports
- GPS tracking software and programs
- Maintenance (Staff/Records)
- City Transit staff
- Witnesses
- Complainant (Interview/History)
- Spotter reports
- Video (camera) and/or audio recordings
- Courtesy cards
- Incident reports (supervisor, transit police, fare/security inspectors)
- Other transit employees
- Route history

STEP FOUR: Findings of fact. Investigate every "issue" (stated in the "statement of issues noted in step two). Separate facts from opinions.

STEP FIVE: Citations of pertinent regulations and rules. Develop list of all regulations, rules, policies, and procedures that apply to the investigation

Title VI requirements
Company rules and procedures
Valley Metro policies and service standards

STEP SIX: 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 becomes “conclusions of law”.

STEP SEVEN: 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 CUSTOMER

Detailed summary of conversation with customer. Send copy of letter to customer.

ACTION TAKEN

Must include specific corrective action for each violation found.
Include a follow-up action plan.
If no violations found, note policies, procedures, etc. reviewed with operator.
Never state “no action taken”.