

Title VI Complaint Procedures

The City of Chandler contracts with Valley Metro to provide all transit service in Chandler. The City relies on Valley Metro customer service to process and investigate Title VI complaints. See the below Valley Metro Title VI Complaint Procedures.

Title VI Complaint Procedures

Any person who believes she or he have 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^[1] or by calling Valley Metro's Customer Service. All complaints are logged into Valley Metro's Customer Assistance System (CAS) and will be investigated according to federal standards.

Valley Metro's Title VI Complaint Form (English and Spanish) is located on our website: (http://www.valleymetro.org/about_valleymetro/civil_rights_policy_statement). The form is available in both English and Spanish. Complaints can also be filed by contacting Valley Metro's Customer Service at:

Email: csr@valleymetro.org

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.

Procedures for Tracking and Investigating Title VI Complaints

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

Each documented Title VI investigative report must address each of the “Seven Federal Investigative” steps found in 28 CFR, Part 35 and FTA Circular 4702.IA. The seven steps are as follows:

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
 - Who?
 - What?
 - When?
 - Where?
 - How?
- Add new issues that surface during investigation
- 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 & 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 & procedures
 - Valley Metro policies & 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 of policies & procedures
 - Review of Title VI provisions

Response to Customer:

- Detailed summary of conversation with customer
- 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”
- Documented information should always include initials & dates