

## **Title VI Compliance**

Your Rights as Under Title VI of the Civil Rights Act of 1964 Title VI of the Civil Rights Act of 1964 is a federal law that protects persons from discrimination based on their race, color, or national origin in programs and activities that receive Federal financial assistance. For example, if you are eligible for Medicaid or other health or human services provided by agencies or organizations that receive Federal government funding, those entities cannot deny you access to their programs or activities because of your race, color, or national origin.

Protections include but are not limited to: Public waiting areas, passenger holding areas, service, quality of service, routing, scheduling, snack bars, gift shops, ticket counters, baggage handler's car rental agencies, taxis, restaurant facilities, rest rooms, passenger ground transportation.

If you need information in a different language, please contact (860) 342-0700 x120. Title VI Policy Statement

## **Title VI Policy Statement**

IMPACT is committed to ensuring that no person is excluded from participation, denied benefits, or otherwise subjected to discrimination under any program or activity based on race, color, religious creed, age, marital status, familial status, national origin, ancestry, sex, gender identity or expression, intellectual disability, mental disability, learning disability, lawful source of income, or physical disability, including but not limited to blindness or deafness.

MARC, as a recipient of federal financial assistance, will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended and related statutes and regulations in all of MARC's programs and activities.

Any person who believes that they have been subject to discrimination or retaliation based on their race, color or national origin may file a Title VI complaint using the procedure outlined under the Title VI Complaint Process and Procedure section of this policy.

To obtain additional information on MARC's nondiscrimination obligations or to file a Title VI complaint, please submit your request or complaint in writing to:

Donnalynn Notaro, VP of Human Resources  
Designated Title VI Coordinator/Complaint Division  
25 Industrial Park Road  
Middletown, CT 06457  
Email: [donnalynn.notaro@marc-cr.org](mailto:donnalynn.notaro@marc-cr.org)  
Phone: (860) 342-0700 x120



## **IMPACT, Inc. Title VI Policy**

Confidential Fax: (860) 272-8320

Complaint forms can also be obtained online at the CTDOT website and filed directly with:

Connecticut Department of Transportation  
Attention: Debra Goss, Title VI Coordinator  
2800 Berlin Turnpike  
Newington, Connecticut 06111  
Email: [Debra.goss@ct.gov](mailto:Debra.goss@ct.gov)

Title VI complaints may also be filed directly to

Federal Transit Administration (FTA):  
FTA Office of Civil Rights  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Federal Highway Administration (FHWA)  
Office of Civil Rights  
1200 New Jersey Avenue, SE  
8th Floor E81-105  
Washington, DC 20590

### **Title VI Complaint Process and Procedure**

All Title VI complaints will be filed in accordance with the procedures outlined in the following Title VI Complaint Process and Procedure.

1. Any person alleging to be grieved by a discriminatory practice may in person, or through legal representation, obtain a Title VI and Sexual Harassment Complaint Form (Attachment B), from IMPACT, Inc. website or by contacting MARC's Title VI Coordinator/Complaint Division (refer to above).
2. Any Title VI complaint must be filed within 180 days following the discriminatory action: or the date the complainant became aware of the alleged discriminatory act.
3. Fill out the form and file the complaint with MARC's Title VI Coordinator/Complaint Division. Alternatively, the Title VI Coordinator/Complaint Division may complete the complaint report form and attach the complaints letter. Complaints received orally or by telephone will be converted to writing and provided to the complainant for confirmation, revision, and signature before processing. Signed allegations of discrimination received by facsimile or email will be acknowledged and processed.
4. Complaints must be in writing and signed by the complainant or their legal representative, and include the complainant's name, address, and telephone number. Complaints shall explain fully as possible the facts and circumstances surrounding the alleged discriminatory action and identify the individual(s)

responsible for the alleged discriminatory action. Electronic signatures will be accepted as a means of formal signature.

5. The Title VI Coordinator/Complaints Division will review the complaint to ensure that it is the appropriate Title VI jurisdiction. If the complaint does not fall within the parameters of Title VI, then it will be addressed through MARC's procedures in place based on the nature of the complaint.
6. If the complaint conforms to the Title VI standards, the Title VI Coordinator/Complaint Division will ensure that the required information is provided, and that the complaint is timely and within the appropriate jurisdiction. The complaint will be accepted unless: it is withdrawn, it is not filed on time, or the complainant fails to provide the required information after a written follow-up request for the missing information. Complainants have 15 business days from the requested time to submit any requested information.
7. Once a Title VI complaint has been confirmed, the Title VI Coordinator/Complaint Division will notify CTDOT of any Title VI complaints received within 10 business days of receipt.
8. IMPACT has up to 120 days to investigate the complaint. If more information is needed to resolve the case, Impact may contact the complainant. The complainant has 15 business days from the date of the letter to send the requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 20 business days, IMPACT can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.
9. Upon completion of the investigation the Title VI Coordinator/Complaint Division will present the results and any corrective recommendations of the investigation to MARC's President/CEO for approval.
10. Upon the final approval of the President/CEO, the Title VI Coordinator/Complaint Division will: implement any corrective actions that have been identified, log the investigation on the Title VI log, and maintain all the complaint and investigation forms for the Department of Transportation Annual Report Survey.
11. Within 10 days of the President/CEO's approval, the Title VI Coordinator/Complaint Division will respond in writing to the complainant with the findings of the investigation. The investigator will issue one of two letters to the complainant: a closure letter or a letter of findings (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or any other action will occur. If the complainant wishes to appeal the decision, they have 30 days after the date of the letter or LOF to do so.

### **Title VI Investigation Process**

1. **Investigation:** An investigation is an official inquiry for the purpose of determining whether there has been a violation of the laws or statutes and includes a determination of appropriate relief where a violation has been found. An

investigation requires an objective gathering and analysis of the evidence, which will ensure that the final decision is as accurate as possible.

2. **Role of the investigator:** The investigator is a neutral party provided by the agency to investigate the issues raised in a complaint. The investigator's behavior, demeanor, and attitude reflect the agency and may affect the degree of cooperation received from the parties. The investigator has an obligation to identify and obtain relevant evidence from all available sources to resolve all the issues under investigation. The Investigator is not an advocate for the complainant or the respondent. The investigator is a neutral fact finder.
3. **Responsibilities of the Investigator:** The investigator must:
  - a. Never express their opinion
  - b. Never tell the parties that the complaint represents a good case or that the complaint is frivolous.
  - c. Always remain neutral, do not take sides.
  - d. Write the facts. State what the facts are based upon the evidence of testimony.
  - e. Decide who is to be interviewed. If the complainant or the respondent is adamant about a witness interview, perform the interview.
  - f. Decide when sufficient evidence has been gathered to begin writing the investigation.