

## **TRIENNIAL SUBMISSIONS TO IDOT**

Pretzel City Transit will report the information contained in this section to IDOT on a triennial basis with the first submission parceled as part of this plan. The following report addresses each of the eight primary Title VI considerations and the associated forms, policies, and activities of its Title VI program.

### **1. Title VI Complaint Procedures**

In order to comply with 40 CFR Section 21.9 (b), Pretzel City Transit has developed procedures for investigating and tracking Title VI complaints. The procedures for filing a complaint will be made available to members of the general public. Pretzel City Transit has adopted the Title VI complaint procedures used by IDOT. The following measures will be taken in dealing with Title VI Complaints:

- A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the Complainant's name, address, and telephone number; name of alleged discriminating official, basis of complaint (race, sex, or national origin), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. Exhibit II provides the Pretzel City Transit Title VI complaint form.
- 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 Pretzel City Transit Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the Coordinator will assist the Complainant in converting the verbal allegation into writing.
- Pretzel City Transit will investigate complaints filed against contractors, consultants, or other sub-recipients. Complaints filed directly against Pretzel City Transit shall be forwarded to the Illinois DOT Title VI Coordinator for investigation.
- When a complete complaint is received, the Title VI Coordinator will provide written acknowledgement to the Complainant within five (5) days by registered mail. At the same time, the complaint will be forwarded to the State of Illinois for investigation.
- If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be notified within 15 business days from receipt of the original complaint. The Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

- Within 15 business days from receipt of a complete complaint, Pretzel City Transit will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Complainant and Respondent, by registered mail informing them of the disposition.
  - If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
  - If the decision is to be investigated, the notification shall inform the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- When Pretzel City Transit does not have sufficient jurisdiction, the complaint will be referred to IDOT for further investigation.
- If the complaint has investigative merit, an investigator will be assigned. A complete investigation will be conducted, and an investigative report will be submitted within 45 days from the receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations.
- A letter of finding will be issued to the Complainant and Respondent. Where appropriate, these letters will include conciliatory measures. A copy of the investigative report shall be forwarded to IDOT within 60 days from recipient of the complaint. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.
- If the Complainant is dissatisfied with Pretzel City Transit's resolution of the complaint, he/she has the right to file the complaint with the IDOT Title VI Coordinator directly.

## **2. Title VI Investigation, Complaint, and Lawsuit Record Keeping Procedures**

In order to comply with 49 CFR Section 21.9 (b), Pretzel City Transit has prepared and maintains a list of active investigations, lawsuits, or complaints naming Pretzel City Transit and alleging discrimination on the basis of race, color, or national origin. The list includes:

- The date the investigation, lawsuit, or complaint was filed;
- A summary of the allegation;
- The status of the investigation; and
- Actions taken in response to the investigation, lawsuit, or complaint.

Pretzel City Transit has adopted IDOT's Title VI recordkeeping procedures for complaints, lawsuits, and investigations. Exhibit III on the following page depicts this format. There are currently no active investigations, lawsuits, or complaints that allege discrimination by Pretzel City Transit on the basis of race, color, or national origin.