



## Title VI Complaint Procedure

As a recipient of federal dollars, ALAMEDA CTC is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a nondiscriminatory basis. ALAMEDA CTC has adopted a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

The complaint procedure has five steps, outlined below:

1. **Submission of Complaint:** Any person who feels that he or she, individually, or as a member of any class of persons, on the basis of race, color, national origin, or low-income status has been excluded from or denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance through ALAMEDA CTC may file a written complaint with the Deputy Director of Planning and Policy. Such complaint must be filed within 180 calendar days after the date the person believes the discrimination occurred. A complaint form may be obtained from ALAMEDA CTC through the Clerk of the Commission or the Deputy Director of Planning and Policy.
2. **Referral to Review Officer:** Upon receipt of the Complaint, the Deputy Director of Planning and Policy shall appoint herself/himself or one or more staff review officers, as appropriate, to evaluate and investigate the Complaint, in consultation with the Legal Counsel. The staff review officer(s) shall complete their review no later than 60 calendar days after the date ALAMEDA CTC received the Complaint. If more time is required, the Deputy Director of Planning and Policy shall notify the Complainant of the estimated time-frame for completing the review. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to ALAMEDA CTC's processes relative to Title VI and environmental justice, as appropriate. The staff review officer(s) shall forward their recommendations to the Deputy Director of Planning and Policy for concurrence. If s/he concurs, s/he shall issue ALAMEDA CTC's written response to the Complainant.

3. **Request for Reconsideration:** If the Complainant disagrees with the response, he or she may request reconsideration by submitting the request, in writing, to the Executive Director within 10 calendar days after its receipt. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by the Deputy Director of Planning and Policy. The Executive Director will notify the Complainant of his decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where the Executive Director agrees to reconsider, the matter shall be returned to the staff review officer(s) to re-evaluate in accordance with Paragraph 2, above.
4. **Appeal:** If the request for reconsideration is denied, the Complainant may appeal the Executive Director's response to the Complaint by submitting a written appeal to the Chair of the ALAMEDA CTC Finance and Administration Committee no later than 10 calendar days after receipt of the Executive Director's written decision rejecting reconsideration. This Committee shall set a hearing on the appeal at its next regular meeting at which hearing the Complainant and staff may make presentations. The decision of the FAC Committee will be final.
5. **Submission of Complaint to the Federal Transit Administration:** A complaint may also be filed directly with the Federal Transit Administration at FTA Office of Civil Rights, 1200 New Jersey Ave. SE, Washington, DC 20590.
6. **Tracking Title VI and related Complaints:** Alameda CTC will keep track of all Complaints filed concerning Title VI and related matters, including the disposition of such Complaints and any actions related to such Complaints. A report of all such Complaints will be made annually to the Alameda CTC Board and to the Metropolitan Transportation Commission.