



Title VI Complaint and Investigation Process

I. Complaint Process.

All Title VI complaints will be filed in accordance with the following procedures.

- A. Any person alleging to be grieved by a discriminatory practice may in person, or through legal representation, obtain a Title VI Complaint Reporting Form from The Kennedy Collective website, <https://www.thekennedycollective.org/title-vi-compliance> or by contacting the agency's Title VI coordinator:
Valerie Reyher
VP, Workforce Development & Social Enterprises
Designated Title VI Coordinator
The Kennedy Collective
2440 Reservoir Avenue
Trumbull, CT 06611
203-365-8522 ext. 2059
Confidential Fax: 203-664-5289
Email: vreyher@thekennedycollective.org
- B. Any Title VI complaint **must be filed within 180 days** following the date of the alleged discriminatory action; or the date the Complainant became aware of the alleged discriminatory action.
- C. Fill out the form and file the complaint with The Kennedy Collective's Title VI Coordinator. Alternatively, the Title VI Coordinator may complete the complaint report forms 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 allegation of discrimination received by facsimile or email will be acknowledged and processed.
- D. Complaints must be in writing, signed by the Complainant or their legal representative, and include the Complainants 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.
- E. The Title VI Coordinator will review the complaint to ensure that it is the appropriate Title VI jurisdiction. If the complaint does not fall with the parameters of Title VI, then

the Title VI Coordinator will redirect the complaint through The Kennedy Collective's Formal Complaint and Appeal Procedure.

- F. If the Complaint conforms to Title VI standards, the Title VI Coordinator 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 The complaint will be accepted unless: it is withdrawn, is not filed timely, or the complainant fails to provide the required information after a written follow-up request for the missing information.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 requested time to submit any requested information.
- G. Once a Title VI complaint has been confirmed, The Title VI Coordinator will notify CTDOT of any Title VI complaints received within 10 business days of receipt.
- H. The Kennedy Collective has up to 120 days to investigate the complaint. If more information is needed to resolve the case, The Kennedy Collective may contact the complainant. The complainant has 15 business days from the date of the letter to send 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, The Kennedy Collective can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.
- I. Upon completion of the investigation the Title VI Coordinator will present the results and any corrective recommendations of the investigation to The Kennedy Collective President/CEO for approval.
- J. Upon the final approval of the President/CEO, the Title VI Coordinator will: implement any corrective actions that have been identified, log the investigation on the Title VI Log, and maintain all of the complaint and investigation forms for the Department of Transportation Annual Report Survey.
- K. Within 10 days of the President/CEO approval, the Title VI Coordinator will respond in writing to the Complainant with the finding of the investigation. The investigator will issue one of two letters to the complainant: a closure letter or a letter of finding (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, she/he has 30 days after the date of the letter or the LOF to do so.

II. Title VI investigation process

A. 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.

B. Role of the Investigator

The investigator is a neutral party provided by the agency to conduct an investigation of 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 in order to resolve all of the issues under investigation. **The investigator is not an advocate for the complainant or the respondent.** The investigator is a neutral fact finder.

C. Responsibilities of the Investigator

The investigator must:

- Never express his/her opinion
- Never tell the parties that the complaint represents a good case or that the complaint is frivolous
- Always remain neutral. DO NOT TAKE SIDES
- Write the facts State what the facts are based upon the evidence of testimony:
- Stay in control at all levels of the process
- Decide who is to be interviewed. The Complainant or the respondent is adamant about a witness interview, perform the interview
- Decide when sufficient evidence has been gathered to begin writing the investigative