



Appendix H

Title VI Policy Statement and Complaint Procedures

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Title VI Compliance

Planning must be done with the involvement and for the benefit of all the region's residents. DVRPC is guided by federal Title VI and nondiscrimination mandates, and the Commission strives to not only meet these mandates, but to create an overall transparent, inclusive planning process. As the metropolitan planning organization (MPO) for the nine-county region, DVRPC is committed to making Title VI a part of our planning process, integrated in all our programs and plans, and a guide for our public participation efforts. On the horizon, we see a Delaware Valley with an enhanced quality of life and a healthful environment for all of its residents.

Title VI of the 1964 Civil Rights Act

Title VI of the Civil Rights Act states that "no person in the United States, shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

DVRPC, as the MPO for the Delaware Valley region, serves as the primary forum where state departments of transportation, transit providers, local agencies, and the public work together to develop local transportation plans and programs that address the region's needs. To meet the requirements of Title VI, the Commission must:

- Enhance its analytical capabilities to ensure that the Long-Range Plan and the Transportation Improvement Program (TIP) comply with Title VI;
- Identify residential, employment, and transportation patterns of low-income and minority populations so that their needs may be identified and addressed, and the benefits and burdens of transportation can be fairly distributed; and

- Evaluate and, where necessary, improve the public involvement process to eliminate barriers and engage minority, disabled, elderly, and low-income populations in regional decision-making.

Title VI Policy Statement

Last updated January 2025

The Delaware Valley Regional Planning Commission (DVRPC) fully complies with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related nondiscrimination mandates in all programs and activities. DVRPC is committed to ensuring that no person is excluded from participation in, or denied the benefits of, all programs and activities on the basis of race, creed, color, national origin, age, gender, disability, sexual orientation, or income level, as protected by Title VI of the Civil Rights Act of 1964 and other related nondiscrimination mandates.

DVRPC's website, www.dvrpc.org may be translated into multiple languages. Publications and other public documents can be made available in alternative languages and formats, if requested. DVRPC's public meetings are always held in ADA-accessible facilities and in transit-accessible locations whenever possible. DVRPC will work to accommodate all reasonable requests for translation, interpretation, accommodations or other auxiliary services and encourages that requests be made at least seven days prior to a public meeting. Requests can be made by contacting the Commission's ADA and Title VI Compliance Officer Shoshana Akins via email at public_affairs@dvrpc.org calling (215) 592-1800, or while registering for an upcoming meeting.

Any person who believes they have been aggrieved by an unlawful discriminatory practice by DVRPC under Title VI has a right to file a formal complaint. Any such complaint must be in writing and filed with DVRPC's ADA and Title VI Compliance Officer Shoshana Akins and/or the appropriate state or federal agency within 180 days of the alleged discriminatory occurrence. Complaints that a program, service, or activity of DVRPC is not accessible to persons with disabilities should be directed to Shoshana Akins as well. For more information on DVRPC's Title VI program or to obtain a [Title VI Complaint Form](#) please visit: www.dvrpc.org/GetInvolved/TitleVI, call (215) 592-1800, or email public_affairs@dvrpc.org

Title VI Compliance Plan

The DVRPC Board has approved the Commission's Title VI Compliance Plan, which establishes a framework for DVRPC's efforts to ensure compliance with Title VI, as well as with other nondiscrimination mandates.

The Plan outlines how federal guidance on Title VI is applied in the Commission's operation which can include projects, programs, policies, communications, and public involvement efforts.

DVRPC's Title VI Implementation Plan

Title VI Complaint Procedure

Purpose

The DVRPC Title VI Complaint Procedure is written to specify the process employed by DVRPC to investigate complaints, while ensuring due process for Complainants and respondents. The process does not preclude DVRPC from attempting to informally resolve complaints. This procedure applies to all external complaints relating to any program or activity administered by DVRPC and/or its subrecipients, consultants, and contractors, filed under Title VI of the Civil Rights Act of 1964 (including its DBE and Equal Employment Opportunity components), as well as other related laws that prohibit discrimination on the basis of race, color, disability, sex, age, or national origin. Additional statutes include, but are not limited to, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the ADA of 1990. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the Complainant. Intimidation or retaliation of any kind is prohibited by law.

Process

An individual, or his or her representative, who believes that he or she has been subject to discrimination or retaliation prohibited by Title VI and other nondiscrimination provisions including ADA, has a right to file a complaint. Complaints need to be filed within 180 calendar days of the alleged occurrence, when the alleged discrimination became known to the Complainant, or when there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.

Complaints shall be in writing and signed by the Complainant or the Complainant's representative. If complaints are received by telephone or in person, the DVRPC Title VI Compliance Manager or other authorized representative shall formally interview the person to provide the basis for the written complaint. If necessary, an authorized person will assist the Complainant in writing the complaint. The complaint form can be made available in alternative languages or formats, if requested. Please call 215-592-1800 for more information.

Generally, the written complaint includes the following information:

- name, address, telephone number, and e-mail of the Complainant;
- basis of the complaint, (e.g. race, color, national origin, sex, age, disability, retaliation);
- a detailed description of the circumstances of the incident that led the Complainant to believe discrimination occurred;
- name(s), title(s), and address(es) of the person(s) who discriminated against the Complainant;
- names, addresses, and phone numbers of people who may have knowledge of the alleged incident or are perceived as parties in the complained-of incident;
- date or dates on which the alleged discrimination occurred; and
- agencies where the complaint was filed.

As an investigation moves forward, additional information may be required. Although this process does not preclude DVRPC from attempting to informally resolve complaints, the decision to resolve informally always rests with the complainant, who may withdraw from the informal process at any time.

If a complaint is filed against DVRPC, the Commission will acknowledge receipt of the complaint by notifying the Complainant and immediately transmitting the complaint to the proper state and federal agency (e.g. Federal Highway Administration, Federal Transit Administration, Pennsylvania Department of Transportation, New Jersey Department of Transportation) for investigation and disposition pursuant to that agency's Title VI complaint procedure. Complaints against DVRPC may also be sent directly to a federal agency. If a complaint is filed with an agency that does not have jurisdiction over the particular reason for discrimination, the complaint will be forwarded to an agency that does.

Complaints against DVRPC subrecipients, consultants, and contractors will be investigated directly by the Commission as follows:

- Within 10 days, the DVRPC Manager of Title VI Compliance will acknowledge receipt of the complaint to the Complainant, and notify the appropriate state and/or federal agency that a Title VI complaint has been received by the Commission;
- Within 60 days, the DVRPC Manager of Title VI Compliance will conduct and complete an investigation and, based on the information obtained, will render a recommendation for action in a report of findings to the DVRPC Executive Director. This report will include the nature of the complaint, remedy sought, and a summary of the investigative findings and activities. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report findings;
- Within 90 days of receipt of the complaint, the DVRPC Title VI Compliance Manager will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with state and federal agencies, if they are dissatisfied with the final decision rendered by DVRPC.

The DVRPC Title VI Compliance Manager will maintain a log of all Title VI, ADA and all other discrimination complaints received by the Commission.

The Title VI Complaint form may be submitted directly to the following agencies:

Civil Rights Specialist

U.S. Department of Transportation
Federal Highway Administration
New Jersey Division
840 Bear Tavern Road, Suite 202
West Trenton, NJ 08628
(609) 637-4200

Title VI Manager

Division of Civil Rights/Affirmative Action
New Jersey Department of Transportation
P.O. Box 600
1035 Parkway Avenue
Trenton, NJ 08625-0600
(609) 530-2336

Title VI Manager

Bureau of Equal Opportunity
DBE / Title VI Division
Pennsylvania Department of Transportation
PO Box 3251
Harrisburg, PA 17105-3251
(717) 783-0301

Civil Rights Specialist

U.S. Department of Transportation
Federal Highway Administration
Pennsylvania Division
228 Walnut Street, Room 508
Harrisburg, PA 17101-1720
(717) 221-3461

Title VI Program Coordinator

Federal Transit Administration
Office of Civil Rights
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590
(202) 366-4043

Title VI Coordinator

Federal Transit Administration - Region 3
U.S. Department of Transportation
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124
(215) 656-7100

Title VI Program Coordinator

Federal Highway Administration
U.S. Department of Transportation
Office of Civil Rights
1200 New Jersey Avenue, SE
8th Floor E81-314
Washington, DC 20590
(202) 366-0693

U.S. Department of Justice

U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Ave, NW
Washington, DC 20530-0001
Phone: (202) 514-3847
Phone (TDD): 202-514-0716

ADA and Title VI Compliance Manager

Shoshana Akins
Delaware Valley Regional Planning Commission
190 N. Independence Mall West, 8th Fl.
Philadelphia, PA 19106
(215) 592-1800

[Title VI Complaint Form](#)[0.1 MB pdf]

[Título VI Formulario de queja](#)[0.1 MB pdf]

[权利六投诉表](#) [0.1 MB pdf]

Language Access

In April 2019, the DVRPC Board adopted a [Limited English Proficiency Plan](#)[2.6 MB pdf], expanding its commitment to upholding the principles and intentions of the 1964 Civil Rights Act and related nondiscrimination mandates. Language barriers may prohibit people who speak English less than very well (as characterized by the US Census Bureau). DVRPC will

translate its vital documents, as identified in the plan, into Spanish. Other materials may be available for translation in another language or format. A request may be submitted through a form located on every product's abstract page. Interpretation may be available at DVRPC's meeting if requested seven days ahead. A request may be submitted through a form located at the bottom of [DVRPC's calendar page](#)