

# HARC, INC.

## Discrimination Policy Statement

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Binder Tab 8

### Your Rights 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 individuals from discrimination based on race, color, or national origin in programs and activities that receive federal financial assistance.

As a recipient of federal funds, including funding through the Federal Transit Administration (FTA) Section 5310 program, Harc, Inc. may not deny access to services, benefits, or participation in programs on the basis of race, color, or national origin.

Protections include, but are not limited to, access to and quality of services, public waiting areas, transportation services, routing, scheduling, passenger facilities, and related supports.

If you need information in a different language or an alternative format, or free language assistance, please contact Harc, Inc. at 860-218-6008.

### Title VI Policy Statement

Harc, Inc. is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity on the basis of 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.

Harc, Inc., as a recipient of federal financial assistance, will comply fully with Title VI of the Civil Rights Act of 1964, as amended, and all related statutes and regulations in all programs and activities.

Any person who believes they have been subjected to discrimination or retaliation based on race, color, or national origin may file a Title VI complaint using the process outlined below.

### Designated Title VI Coordinator

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

Senior Director of Human Resources  
Designated Title VI Coordinator / Complaint Division  
Harc, Inc., 900 Asylum Avenue, Hartford, CT 06105 (MS #1107)  
Tel: 860-218-6008 | Fax: 860-541-1769 | [www.harc-ct.org](http://www.harc-ct.org)

### External Filing Options

A Title VI Complaint Form may also be obtained online and filed directly with:

**Connecticut Department of Transportation**

Attention: Title VI Coordinator  
2800 Berlin Turnpike, Newington, CT 06111  
Email: [DOT.TitleVIOffice@ct.gov](mailto:DOT.TitleVIOffice@ct.gov) | Tel: 860-594-2169 | Free language assistance: 860-594-2109

A Title VI complaint may also be filed with:

**Federal Transit Administration (FTA), Office of Civil Rights**

1200 New Jersey Avenue SE, Washington, DC 20590

**Federal Highway Administration (FHWA), Attention: Nichole McWhorter**

**Federal Highway Administration**

**Office of Chief Counsel**

**1200 New Jersey Avenue, SE  
West Floor W58-302  
Washington, DC 2059**

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

Any person who believes they have been aggrieved by a discriminatory practice may file a Title VI complaint in person or through legal representation by obtaining a Title VI Complaint Form from Harc, Inc. or by contacting the Title VI Coordinator.

1. Complaints must be filed within 180 days of the alleged discriminatory action or the date the complainant became aware of the action.
2. Complaints must be submitted in writing and signed by the complainant or their legal representative. Complaints received verbally or by telephone will be reduced to writing and provided to the complainant for confirmation and signature before processing. Electronic signatures are accepted.
3. Complaints must include the complainant's name, address, telephone number, and a detailed description of the alleged discriminatory action, including identification of any individuals involved.
4. The Title VI Coordinator will review the complaint to determine whether it falls within Title VI jurisdiction. Complaints outside Title VI scope will be addressed through other applicable Harc, Inc. procedures.
5. A complaint will be accepted unless it is withdrawn, untimely, or incomplete after a written request for additional information. The complainant will have 60 business days to provide requested information.
6. Harc, Inc. will notify CTDOT of all Title VI complaints received within 10 business days of receipt.
7. Harc, Inc. has up to 120 days to investigate a complaint. Failure of the complainant to provide requested information within required timeframes may result in administrative closure.
8. Upon completion of the investigation, findings and any corrective actions will be presented to the President and CEO of Harc, Inc. for approval.
9. Following approval, Harc, Inc. will implement corrective actions, log the complaint, and retain all documentation for required reporting purposes.
10. Within 10 days of final approval, the complainant will receive a written response outlining the findings. If dissatisfied, the complainant may appeal within 30 days of the decision.

## **Title VI Investigation Process**

**Investigation.** An investigation is an objective inquiry conducted to determine whether a violation of Title VI has occurred and to determine the appropriate remedy where a violation is found. It requires the objective gathering and analysis of evidence so that the final decision is as accurate as possible.

**Role of the Investigator.** The investigator is a neutral party who investigates the matters raised in a complaint. The investigator is not an advocate for the complainant or the respondent, but a neutral fact-finder.

**Responsibilities of the Investigator.** The investigator must:

- Remain impartial and neutral at all times and not take sides.
- Never express a personal opinion, and never tell the parties that the complaint is a strong case or that it is frivolous.
- Gather and analyze relevant evidence from all available sources.
- Interview appropriate witnesses; if the complainant or respondent insists that a witness be interviewed, the interview will be conducted.

- Document facts based solely on the evidence.
- Decide when sufficient evidence has been gathered to complete the investigation.

### **Record of Title VI Complaints, Investigations, and Lawsuits**

In accordance with FTA Circular 4702.1B, Harc, Inc. maintains a log of all Title VI complaints, investigations, and lawsuits. The date, a summary, and the status of any such matter are recorded in the Title VI Complaint Log, reported to CTDOT as required, and made available upon request.

### **Effective Date and Adoption**

This policy is effective upon adoption and applies to all Harc, Inc. programs and activities receiving federal financial assistance. It will be reviewed and updated as necessary to reflect changes in operations and regulatory requirements.

*Russell Coleman*

Russell Coleman, MBA, President and CEO

06/01/2026

Date