

County of Lebanon Transit Authority (LT)



Policy for Addressing Complaints

General Public, Title VI Civil Rights, and ADA Complaint Procedures

Lebanon Transit is committed to providing **safe, reliable, equitable, and accessible transportation services** to all members of the public. This commitment extends beyond service delivery to include the fair and respectful treatment of individuals who interact with Lebanon Transit in any capacity. Lebanon Transit recognizes the importance of public trust and accountability and is dedicated to addressing customer concerns and complaints in a **prompt, impartial, consistent, and transparent manner**.

This procedure establishes a standardized process for the **receipt, investigation, documentation, resolution, and monitoring of public complaints**, including those alleging discrimination or inequitable treatment. These procedures apply to all Lebanon Transit programs, services, activities, employees, contractors, and subrecipients and are designed to ensure compliance with applicable federal civil rights laws and regulations, including **Title VI of the Civil Rights Act of 1964** and the **Americans with Disabilities Act (ADA) of 1990**.

Policy of Non-Discrimination

Lebanon Transit operates its programs and services in full compliance with **Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d)** and all related federal regulations, directives, and guidance issued by the Federal Transit Administration (FTA). Lebanon Transit assures that **no person**, on the basis of **race, color, or national origin**, shall be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Lebanon Transit program, service, or activity.

Lebanon Transit also complies with the **Americans with Disabilities Act of 1990**, as amended, and related federal regulations. Lebanon Transit is committed to ensuring that individuals with disabilities have **equal and meaningful access** to transportation services, programs, facilities, information, and opportunities, and that reasonable modifications to policies, practices, or procedures are provided when necessary to avoid discrimination, unless doing so would fundamentally alter the nature of the service or pose a direct threat to safety.

Any person who believes they have been subjected to discrimination or unequal treatment under a Lebanon Transit program or service may file a complaint. Complaints may be submitted by filing a **formal written complaint** or by contacting Lebanon Transit directly. Filing a complaint with Lebanon Transit does not preclude a complainant from filing a complaint directly with the Federal Transit Administration (FTA) Office of Civil Rights.

All complaints should be filed within **one hundred eighty (180) calendar days** of the alleged incident. Complaints filed after this timeframe may be accepted for good reasons, such as circumstances beyond the complainant's control. The Title VI/ADA Compliance Officer shall determine whether good cause exists.

Lebanon Transit will make reasonable efforts to ensure that complaint procedures are accessible to all individuals, including persons with disabilities and individuals with limited English proficiency and are available upon request at no cost to the complainant.

Please submit **General Complaints** to:

Lebanon Transit
Attn: Manager of Operations
200 Willow Street
Lebanon, PA 17046
Phone: 717-274-3664
info@lebanontransit.org

Please submit **ADA and Title VI Civil Rights Complaints** to: (including reasonable modification denial complaints)

Lebanon Transit
Attn: Human Resources Manager / ADA & Title VI Compliance Officer
200 Willow Street
Lebanon, PA. 17046
Phone: 717-274-3664
humanresources@lebanontransit.org

Complaint Documentation

All complaints shall be documented using **Lebanon Transit's official Complaint Form**. Complaints may be submitted in writing, in person, by telephone, or through the Lebanon Transit website, www.lebanontransit.org. This policy and forms are available on the Lebanon Transit website and in alternative formats upon request.

Written records shall be maintained for **all complaints**, regardless of type, and shall include at a minimum:

- Name of the complainant
- Contact information
- Nature of the complaint
- Date and time of the alleged incident
- Location and division involved
- Recommended corrective action
- Action taken and date resolved

General Public Complaint Procedure

Once all pertinent information has been gathered, the completed Complaint Documentation Form will be submitted to the **Manager of Operations**, who will initiate and oversee an investigation.

Upon completion of the investigation:

- Findings and corrective actions will be documented on the Complaint Documentation Form
- The completed form will be forwarded to the **Fixed Route Supervisor** who is responsible to document **all** complaints.
- The Fixed Route Supervisor will log the complaint and its resolution in a centralized tracking spreadsheet

Complaint data may be summarized and analyzed using trend-tracking tools (e.g., charts or graphs) to identify recurring issues and potential training or operational needs.

The **Manager of Operations** shall ensure that all customer complaints are addressed in a **prompt, fair, and equitable manner**. Investigation results will be communicated to the appropriate supervisor and the Executive Director; corrective actions will be implemented and documented.

If a complainant believes their concern has not been adequately resolved, they shall be provided with access to the **Executive Director** for further review.

Title VI and ADA Complaint Procedure

All complaints will be investigated promptly. Complaints alleging discrimination based on **race, color, or national origin (Title VI)** or involving **disability access or accommodation (ADA)** shall be forwarded immediately to the **Human Resources Manager**, who serves as Lebanon Transit's **Title VI and ADA Compliance Officer**.

Investigation Process

The Lebanon Transit Title VI/ADA Compliance Officer will review each complaint and will assign a neutral party to conduct the investigation when the Compliance Officer has direct involvement in the matter or when impartiality could reasonably be questioned. At a minimum, the investigation will include:

- Review of relevant documents, policies, and procedures
- Interviews with the complainant
- Interviews with witnesses or individuals identified by the complainant
- Interviews with individuals who may have experienced similar conduct or who possess relevant information

Reasonable measures will be taken to preserve confidentiality to the extent permitted by law. Determinations are made by the Compliance Officer.

Complaint Response Timeframes

Lebanon Transit is committed to addressing all complaints promptly and fairly. Response timeframes vary based on the type of complaint and applicable federal requirements. If additional time is needed, the complainant will be notified in writing of the reason for the delay and the expected completion date.

General Transit Service Complaints

- Acknowledgment: within **3 business days** of receipt
- Investigation and written response: within **15 business days**

ADA/Title VI Civil Rights Complaints (Including Reasonable Modification Requests)

- Acknowledgment: within **5 business days** of receipt
- Investigation and written determination: within **45 calendar days**

Appeal Timeframes

A complainant may file an appeal of an ADA or Title VI determination within **sixty (60) calendar days** of the date of the written decision.

- Acknowledgment of appeal: within **5 business days**
- Written decision on appeal: within **45 calendar days** of receipt

Appeals will be reviewed by a staff member who was not involved in the original determination, when feasible. Appeals will be handled in an accessible manner, including alternative formats upon request.

Determination and Resolution

A **written final report** will be prepared for the **Executive Director**, with a copy provided to the **Lebanon Transit Solicitor**. If a violation is identified, appropriate corrective actions will be taken immediately.

The complainant will be notified **in writing** of the outcome of the investigation.

Investigations and final determinations will generally be completed within **forty-five (45) calendar days**, unless additional time is required due to extenuating circumstances.

Filing a Complaint with the Federal Transit Administration

Complainants may file an **ADA/Title VI Civil Rights** complaint directly with the Federal Transit Administration within one hundred eighty (180) days of alleged discrimination.

Federal Transit Administration

Office of Civil Rights
Attention: Title VI Coordinator
East Building, 5th Floor
1200 New Jersey Avenue, SE
Washington, DC 20590

Recordkeeping and Monitoring

The Title VI/ADA Compliance Officer shall maintain a **Title VI complaint log**, which includes:

- Date the complaint was filed
- Summary of allegations
- Status of the complaint
- Actions taken by Lebanon Transit

Title VI and ADA complaints shall be tracked separately from general service complaints as required.

All complaints and resolutions shall be reviewed on a **quarterly basis** to identify trends, recurring issues, and training or policy improvement needs.

Quarterly reviews shall include managers and supervisors from all Lebanon Transit divisions, including:

- Administrative
- Shared Ride
- Fixed Route
- Maintenance

If Lebanon Transit receives a Title VI complaint in the form of a **formal charge or lawsuit**, the **Lebanon Transit Solicitor** shall oversee the investigation process.

Lebanon Transit will maintain records for a minimum of five (5) years.

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Lebanon Transit
200 Willow St
Lebanon, Pa 17046
717-274-3664

Lebanon Transit is a Drug Free Workplace
Lebanon Transit is an Equal Employment Opportunity Employer