

Title VI Complaint Process

The Oklahoma Center for the Advancement of Science and Technology (OCAST) uses the following, detailed internal procedures for prompt processing and resolution of all Title VI complaints received directly by any of its departments having responsibilities under the Title VI and the related Nondiscrimination statutes. These procedures include but are not limited to:

- 1) Any person, group of persons, or entity that believes they have been subjected to discrimination under Title VI of the Civil Rights Act may file a written complaint with the OCAST Administration Director (Director). A complaint may also be filed by a representative on behalf of such a person.
- 2) In order to have the complaint considered under this procedure, the complaint must be filed no later than 180 calendar days after:
 - a) The date of the alleged act of discrimination; or
 - b) Where there has been a continuing course of conduct, the date on which that conduct was discontinued.
- 3) Complaints shall be filed using OCAST's Title VI Complaint Form (available at <https://oklahoma.gov/ocast/about-ocast.html>, or by contacting the Administration Director). Complaints shall set forth, as fully as possible, the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of the recipient, the person shall be interviewed by the Director. If necessary, the Director will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.

Complaints should be directed to:

Elaine Spell, Administration Director
Administrative Services Division
755 Research Parkway, Suite 110
Oklahoma City, OK 73104
Email: Elaine.Spell@OCAST.ok.gov
Phone: (405) 319-8424

- 4) Upon receipt of the signed complaint form, the Director will log the complaint, determine the basis of the complaint, authority/jurisdiction, and who should conduct the investigation.
- 5) The Director reviews and determines the appropriate action regarding every Title VI complaint. OCAST will not proceed with or continue a complaint investigation if:
 - a) The complaint is, on its face, without merit.
 - b) The same allegations and issues of the complaint have been addressed in a recently closed investigation or by previous federal court decisions.
 - c) The complainant's or injured party's refusal to cooperate (including refusal to give permission to disclose his or her identify) has made it impossible to investigate further.

- 6) The Director will investigate the complaint and log the following information within **ten (10) calendar days** of receipt of the allegation(s):
 - a) Name, address, and phone number of the complainant.
 - b) Email address if available.
 - c) Basis of complaint (i.e., race, color, national origin, sex, age, religion, disability/handicap, income).
 - d) Date of the alleged discriminatory act(s).
 - e) Date of complaint received by the recipient.
 - f) A statement of the complaint.
 - g) Other agencies (state, local or Federal) where the complaint has been filed.
 - h) An explanation of the actions the recipient has taken or proposed to resolve the issue(s) raised in the complaint.

- 7) Within **ten (10) business days**, the Director will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to be taken to process the allegation(s). The notification letter shall contain(s):
 - a) The basis of the complaint.
 - b) A brief statement of the allegation(s) over which OCAST has jurisdiction.
 - c) A brief statement of OCAST's jurisdiction over the recipient to investigate the complaint; and
 - d) An indication of when the parties will be contacted.

- 8) If the complaint is against a contractor or subrecipient(s), OCAST will have **15 business days** from the receipt of the complaint to advise the appropriate state or federal agency (e.g., UST for program related projects) of the receipt of a complaint, and the status of the investigation.

- 9) The Director will work with appropriate parties to conduct an in-depth, personal interview with the complainant(s). Information gathered in this interview includes: identification of each complainant by race, color, sex, age, religion, national origin, disability/handicap, or income status; name of the complainant; a complete statement concerning the nature of the complaint, including names, places, and incidents involved in the complaint; the date the complaint was filed; and any other pertinent information the investigation team feels is relevant to the complaint. The interviews are recorded either on audio tape or by taking notes. Every effort will be made to obtain early resolution of complaints at the lowest possible level.

- 10) Within **15 business days** of receiving comments from the federal or state agency, the Director will meet with all parties to the complaint to discuss the comments received by the federal or state agency.

- 11) Within **60 calendar days** from the date the original complaint was received, the Director will coordinate the preparation of a written investigative report. The investigative report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. The written report shall be reviewed and finalized by the Director and sent to the Oklahoma Attorney General.

- 12) The Oklahoma Attorney General will review the investigative report and meet with the Director and Executive Director to determine the appropriate action. Within **90 calendar days** of receipt of the complaint, the Director will issue a “Letter of Findings” to the complainant.
- 13) If the complaint cannot be resolved by OCAST to the satisfaction of all parties concerned, the party not satisfied is advised of his or her right to appeal pursuant to Title 49, Code of Federal Regulations, Part 21. The appeal must be filed, in writing no later than **180 calendar days** after the date of the alleged discrimination, unless the time for filing is extended by the Secretary to:

U.S. Department of Treasury
Civil Rights and Equal Employment Opportunity
1500 Pennsylvania Ave, NW
Washington, D.C. 204220

Email: crcomplaints@treasury.gov

<https://home.treasury.gov/about/offices/management/civil-rights-and-diversity>

A complaint may be filed with the Secretary; U.S. Department of Treasury, before, during, or after the complaint has been filed with OCAST.