Western Connecticut
COUNCIL OF GOVERNMENTS

WESTCOG

TITLE VI
CIVIL RIGHTS AND
PUBLIC PARTICIPATION PLAN

Approved by WestCOG, SWRMPO and
HVMPO on December 15, 2016

FOR THE WESTERN CT COUNCIL OF GOVERNMENTS, THE SOUTH WESTERN REGION AND HOUSATONIC VALLEY METROPOLITAN PLANNING ORGANIZATIONS

SERVING BETHEL, BRIDGEWATER, BROOKFIELD,
DANBURY, DARIEN, GREENWICH, NEW CANAAN, NEW FAIRFIELD,
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1. INTRODUCTION

A requirement for receipt of federal transportation planning and project funds in urban areas is the continuing operation therein of a regional Metropolitan Planning Organization (MPO). The purpose of this document is to provide a Title VI Civil Rights and Public Participation Plan for the two MPOs within the boundary of the Western CT Council of Governments (WestCOG).

As WestCOG administers funds for the two MPOs and serves as their host agency, that Council itself is subject to the Title VI compliance procedures.

The State of Connecticut's defined boundary for the Western Connecticut Planning Region served by WestCOG encompasses eighteen municipalities. Since 1981 there have been two federally structured MPOs operating within this geography.

MPOs have formal roles in the federal transportation planning process along with the Connecticut Department of Transportation and the U.S. Department of Transportation. Federal law (Code of Federal Regulations 23 United States Code §134 - Metropolitan Transportation Planning) defines the structure of MPOs nationwide.

The South Western Region MPO (SWRMPO) encompasses eight municipalities: Darien, Greenwich, New Canaan, Norwalk, Stamford, Weston, Westport and Wilton.

Then the Housatonic Valley MPO encompasses ten municipalities: Bethel, Bridgewater, Brookfield, Danbury, New Fairfield, New Milford, Newtown, Redding, Ridgefield and Sherman.

Taken together the combined area of the two MPOs precisely matches the eighteen town area of WestCOG. Both MPOs maintain agreements with WestCOG for it to serve as their host agency for staffing and administrative matters, one of which is the maintenance and implementation of this Title VI Civil Rights and Public Participation Plan.

Note that the objectives and administrative practices for Title VI, Environmental Justice, Limited English Proficiency and the Public Participation Plan have interrelated goals and practices. Thus to maximize the effect of each, and to insure effective administration, these key public access policies are integrated together into this one document.

Within federal law Title 23, Code of Federal Regulations 450.316, is the statement that "a minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted by the MPO."

Therefore, SWRMPO and HVMPO will place public notices in this regard and allow for the required comment period prior to consideration of adopting the Public Participation Plan below.

Throughout this document, WestCOG assumes the responsibility for Title VI planning and compliance for itself and for the two MPOs within its region. To insure Title VI compliance and full public participation, all three organizations jointly agreed to the policies and procedures herein.

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2. TITLE VI COMPLIANCE PLAN

2A. OVERVIEW AND POLICY

Title VI, that is "Title Six," or more specifically 42 United States Code Section 2000d, was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

As WestCOG, SWRMPO and HVMPO all receive federal transportation planning assistance they are required to prepare and adhere to this Title VI Plan. Their joint Title VI Policy Statement is as follows:

WestCOG, SWRMPO and HVMPO will effectuate the provisions of Title VI of the Civil Rights Act of 1964, as amended (42 USC Section 2000d), 49 CFR Part 21, and 23 CFR Part 200, FTA circular 4702.1.B and other nondiscrimination directives.

WestCOG, SWRMPO and HVMPO prohibit discrimination on the basis of race, color, or national origin and will ensure that no person is excluded from participation in, denied the benefits of, or is otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the United State Department of Transportation.

WestCOG, SWRMPO and HVMPO further assure that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. The three organizations will develop a Title VI discrimination complaint process that is compliant with the Title VI requirements.

The WestCOG Executive Director has the overall responsibility for carrying out the commitments of SWRMPO, HVMPO and WestCOG to the Title VI Program. The Title VI Program is then an organization wide initiative, and all employees share the responsibility for ensuring compliance.

Title VI Program implementation responsibilities have been delegated by the Executive Director to WestCOG's Associate Planner, who will be responsible for the day-to-day collection, analysis, and reporting of Title VI related data.

The Associate Planner will conduct compliance and program reviews to ensure that SWRMPO, HVMPO and WestCOG are adhering to the procedures outlined in this Title VI Plan.

The following federally required "multilingual vital documents" are points of entry into the region's federally sponsored transportation planning program. Vital documents are defined as those "critical for ensuring meaningful access to the recipient's major activities" and are as follows:

6A. TRANSLATED TEXT TO ACCESS SWRMPO TRANSPORTATION PLAN
in English, Spanish, Portuguese and French
6B. TRANSLATED TEXT TO ACCESS HVMPO TRANSPORTATION PLAN
in English, Spanish, Portuguese and French
6C. TRANSLATED TEXT TO ACCESS TRANSPORTATION IMPROVEMENT PROGRAMS
in English, Spanish, Portuguese and French
6D. TRANSLATED TEXT TO ACCESS METROPOLITAN PLANNING ORGANIZATIONS
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6E. TRANSLATED TEXT TO APPEAR ON MPO AND WESTCOG AGENDAS
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6G: TITLE VI COMPLAINT FORM
in English, Spanish, Portuguese and French

As such they are available in English and for Title VI purposes have also been translated into Spanish, Portuguese and French. The appropriateness of the four languages selected will be demonstrated below. The detailed texts can be accessed in Section 6.

As with other translated texts, to insure media flexibility in their use, staff will copy and insert them as needed into the digital or hard copy media appropriate for their Title VI Plan objective.

There is more need than in earlier years to maximize flexibility in the distribution of Title VI documents utilizing PowerPoint formats, graphics, web site formats, emails, other digital documents, as well as traditional hard copy posters and flyers.

2B. COMPLAINT PROCEDURE

This procedure is used to manage and evaluate complaints received on the Title VI Complaint Form. See Section 6G for the forms in English, Spanish, Portuguese and French. The text of the complaint procedure is as follows:

TITLE VI COMPLAINT PROCEDURE

OVERVIEW OF TITLE VI

Title VI (Title 6) of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

The Western Connecticut Council of governments (WestCOG), South Western Region Metropolitan Planning Organization (SWRMPO) and the Housatonic Valley Metropolitan Planning Organization (HVMPO) receive such assistance thru the U.S. DOT.

More specifically, Title VI provides that "no person in the United States shall, on the ground 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."

Accordingly, it is the policy of WestCOG, SWRMPO and HVMPO that discrimination on the ground of race, color or national origin shall not occur in connection with transportation planning programs or any other organizational activities.

WHO MAY FILE A TITLE VI COMPLAINT?

Any person who believes that he or she has been subjected to discrimination prohibited under Title VI, Executive Order 12898, and/or Executive Order 13166 may file a complaint with SWRMPO's and HVMPO's Title VI Coordinator. Title VI allegations must involve a covered Title VI basis such as race, color or national origin.

In addition, any person who believes that he or she has been subjected to discrimination due to any reason should file. This includes low income, age, and disability. Since knowledge of those discriminatory acts is important, it will then be determined whether the complaint falls under Title VI with respect to race, color or national origin.

The Title VI Coordinator will determine the jurisdiction of the complaint, acceptability, the need for additional information, and investigate the merit of the complaint.

In cases in which the complaint is against one of WestCOG's sub recipients of federal funds, SWRMPO or HVMPO may assume jurisdiction to investigate and adjudicate the case. SWRMPO or HVMPO may themselves provide or obtain services to review or investigate the matter.

INFORMATION TO INCLUDE

A. The complaint may be filed by the affected party or a representative and must be formatted as a text communication.

If a complainant cannot themselves write the complaint, they can contact WestCOG staff who will reduce the complaint into writing on their behalf. The complainant must still sign and date the complaint even if another person writes the complaint.

B. The complaint must be filed within 180 calendar days of the alleged occurrence(s) or when the alleged discrimination became known to the complainant.

C. All complaints will be accepted. After acceptance the complaint will be reviewed to determine whether or not it is a Title VI complaint.

D. Include the location and date of the alleged act of discrimination.

E. Include the date when the complainant became aware of the alleged discrimination.

F. Note that it is not the responsibility of the complainant to identify the person alleged to have discriminated against the complainant. This is the responsibility of the investigator. The complainant only has to identify where the alleged discrimination took place and an approximate time.

G. A detailed description of the incident.

H. Note that the process does not limit the right of the complainant to file complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. And the process does not include punitive damages or compensatory remuneration for the complainant.

HOW TO FILE

For more information on how to prepare a complaint, to receive a copy of the complaint form, or to file a complaint, contact WestCOG's Title VI Coordinator:

Nicole Sullivan, Associate Planner
Western CT Council of Governments
1 Riverside Road, Newtown, CT 06482
Email nsullivan@westcog.org
Telephone/Fax 475-323-2071

2C. INVESTIGATION OF COMPLAINTS

This section details the process WestCOG will utilize to address Title VI complaints, ensuring due process for complainants and respondents. This detailing of the process does not preclude WestCOG from attempting to resolve complaints informally.

To maximize internal office coordination and enhance compliance, all WestCOG, SWRMPO and HVMPO Title VI activities are directed to one staff person, Nicole Sullivan, Associate Planner, phone at 475-323-2071 and email at nsullivan@westcog.org.

Any complaints received by N. Sullivan as the Title VI Coordinator will be immediately copied to Debra Goss, CTDOT Title VI Coordinator, CTDOT Office of Contract Compliance, 2800 Berlin Turnpike, Newington, CT 06111.

Concerning any aspect of Title VI, note that the public also has the right to file complaints directly with the CTDOT Title VI Coordinator.

As required by CTDOT, a log format has been created for registering Title VI complaints, investigations and lawsuits. This is included as Appendix item 7D. All complaints will receive a case number and all information pertaining to the case will be logged in.

The Title VI Coordinator will prepare an investigative report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

SWRMPO and HVMPO will make reasonable efforts to obtain early resolution of complaints. The option of informal mediation between the affected parties and SWRMPO and HVMPO may be utilized for resolution at any stage of the process.

SWRMPO and HVMPO will notify the parties of their findings and decision within fifteen calendar days of final report completion. If the complainant is not satisfied with the results of the investigation and final report, he or she will be advised of the right to appeal to the U.S. Department of Transportation (USDOT).

2D. ADMINISTRATIVE CONSIDERATIONS

Staff Training On Title VI: Periodically the Title VI Coordinator will hold a meeting with staff from all three organizations to review Title VI procedures and address questions on this topic. Such meetings will be noted in SWRMPO and HVMPO Quarterly Transportation Reports.

Technical Assistance to Ensure Compliance: As for citizen's requests for technical assistance, delivery of technical assistance by staff will not encourage, entrench, subsidize or result in discrimination.

Monitoring Sub Recipients: As for monitoring sub recipients for compliance with Title VI, note that the CTDOT approved contract format for U.S. DOT funding for the three organization's sub recipients includes a section entitled "Nondiscrimination in Contracts." SWRMPO and HVMPO endorse this language which states:

"The consultant agrees and warrants that in the performance of this contract it will not discriminate or permit discrimination against any person or group of persons on the grounds of race, color, religious creed, age, marital status, national origin, sex, mental retardation or physical disability."

Continuing: "Including, but not limited to, blindness, unless it is shown by such contractor that such disability prevents performance of the work involved, in any manner prohibited by the laws of the United States or of the State of Connecticut."

The basis for monitoring compliance will be the inclusion within all sub recipient contracts of a specific requirement that the consultant's planning process and

activity be conducted in accordance with this Title VI Civil Rights and Public Participation Plan.

Demographics of Meeting Attendees: Due to its strong state Freedom of Information (FOI) laws, Connecticut has no registration or other requirements for attendees at public meetings held by WestCOG, SWRMPO or HVMPO.

Such meeting attendees may not be required to sign in or provide any form of identity. This includes any personal qualities or identifiers such as address, age, race, gender, etc.

The specific wording within Connecticut's Freedom of Information statute is that "no registration or other requirements may be imposed on a member of the public seeking attendance at a public meeting."

However, Title VI seeks to record demographics in some way. The most practical method will be to note in the meeting record references to such demographics made by attendees who themselves speak at the meeting.

These could include such comments as "my income group will be impacted by Project X" or "my racial group will be impacted by Project Y" etc. This may or may not include name, for as noted above, under Connecticut law access to speaking may not be made conditional upon providing a name.

Office Posting: A Title VI posting is on display in the office entrance area.

Minority Representation on Committees: All WestCOG, SWRMPO and HVMPO committees are open to minority representation. Persons seeking to be included based upon their affiliation with a minority group, or personal statement that the person represents a minority viewpoint, will be included.

Any planning activity in or affecting a minority demographic area will include outreach to minority groups listed in this document. The notice in such instances will state "minority representation on this technical (or advisory) committee is welcome."

Title VI Within Quarterly Reports: This inclusion is a regular feature of quarterly reports and will be continued.

Notices Available On Web Site: As part of this Title VI Plan web posting are maintained. The link for access is: https://westcog.org/mpos/.

3: TITLE VI ENVIRONMENTAL JUSTICE

Attention to Environmental Justice (EJ) was amplified by Executive Order No. 12898, issued February 11, 1994, which requires that each federal agency incorporate EJ into its mission.

This is to be accomplished "by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations."

Note that Environmental Justice focuses upon a different categorization of population than addressed by Title VI, which was concerned with race, color, or national origin. However, for some individuals and neighborhoods these areas of federal interest overlap.

Therefore, Environmental Justice principles are incorporated into the processes and products of federally funded regional transportation planning. As guidance, the US DOT outlined three principles to guide Metropolitan Planning Organizations in their EJ evaluations, as follows:

1. Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low income populations.

2. Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.

3. Prevent the denial of, the reduction in, or the significant delay in, the receipt of benefits by minority and low-income populations.

In order for SWRMPO and HVMPO planning efforts to comply with EJ mandates, characteristics of the two MPO area populations are evaluated against three criteria at the census tract level.

Note that the three criteria are taken from SWRMPO's Title VI Plan. That methodology is now being extended to HVMPO and WestCOG. The SWRMPO methodology is for a census tract area to satisfy one of the criteria if it exceeds a designated threshold. The three criteria and thresholds utilized are:

1) Percent of minority population, defined as all persons except those identifying themselves as White, non-Hispanic. The threshold for measurement is the MPO area percent of minority population.

2) Per capita income. The threshold for measurement is the MPO area per capita income.

3) Percent of persons below the poverty level. The threshold for measurement to be the MPO area percent of person below the poverty level.

As the next step, if a census tract satisfies all three thresholds simultaneously, then it is designated an area for Environmental Justice evaluation.

Using the method described above, an analysis was conducted examining all census tracts in the SWRMPO and HVMPO areas, with the results as follows:

SWRMPO ENVIRONMENTAL JUSTICE AREA DEFINED

The SWRMPO regional thresholds to identify an Environmental Justice Area were as follows: percent minority population 33.8%%, per capita income $65,632, percent of population below poverty level 7.2%. This information is derived from the latest American Community Survey.

In order to meet the criteria as an Environmental Justice Area, a census tract's measurements had to exceed the percent minority population and percent of population below poverty level, and not exceed the regional per capita income. These conditions were met in 23 of the 84 census tracts in the SWRMPO region:

1) **Greenwich** for 1 census tract: 113
2) **Norwalk** for 8 census tracts: 434, 437, 438, 440, 441, 442, 444 and 445
3) **Stamford** for 14 census tracts: 201, 209, 211, 214 thru 217, 218.01, 218.02, and 219 thru 223

HVMPO ENVIRONMENTAL JUSTICE AREA DEFINED

The HVMPO regional thresholds to identify an Environmental Justice Area were as follows: percent minority population 23.0%, per capita income: $44,086, percent of population below poverty level 6.7%. This information is derived from the latest American Community Survey.

In order to meet the criteria as an Environmental Justice Area, a census tract's measurements had to exceed the percent minority population and percent of population below poverty level, and not exceed the regional per capita income. These conditions were met in 9 of the 47 census tracts in the HVMPO region:

1) **Danbury** for 9 census tracts: 2101 thru 2106, 2107.01, 2107.02 and 2112

Source: Michael Sullivan of WestCOG GIS

Environmental Justice requirements will be met if the population groups of concern in these areas benefit from a transportation project in the same manner as will the general population. Further, that no group is singled out for inadvertent receipt of adverse impacts of a proposed project.

SWRMPO and HVMPO insure that the 1994 Environmental Justice requirements above are met through the following policies and evaluations:

1. Utilize FHWA 2007 Context Sensitive Solutions Policy: According to the FHWA: "The application of Context Sensitive Solutions (CSS) within the transportation planning process assists regions and communities reach their transportation goals by encouraging the consideration of land use, transportation, and infrastructure needs in an integrated manner.

When transportation planning reflects community input and takes into consideration the impacts on both natural and human environments, it also promotes partnerships that lead to "balanced" decision-making. "

CSS is not specifically targeted towards the nation's Environmental Justice Areas. More importantly, CSS is to be considered during the planning of all projects for which FHWA funds are sought.

CSS assists EJ by requiring broad interpretation of project impacts. The traditional engineering process has had to raise its vision beyond the edge of the pavement or right of way and address project impacts in the community. The world of

transportation professionals has had to adjust. CSS is a close ally of EJ. SWRMPO and HVMPO subscribe to CSS policies.

2. Utilize CT DOT 2014 Complete Streets Policy: Under this policy, the needs of all transportation users in a neighborhood must be considered. Pedestrian, bicycle and transit concerns may no longer be shunted aside.

The Complete Streets Policy is the human side of the earlier CSS policy and another ally of EJ equity. SWRMPO and HVMPO subscribe to Complete Streets policies.

3. Include EJ Evaluation Work Task in Planning Studies: SWRMPO and HVMPO will include a work item requiring EJ evaluation in transportation planning studies impacting EJ areas.

The February 2016 Downtown Danbury Transit Oriented Development Planning Grant Application to CTOPM provides one model. Within that application Danbury includes the following work program requirement:

"For all transit relocation proposals considered, determine if there will be improved mobility opportunities for the elderly, disabled, isolated, economically disadvantaged and federally defined Environmental Justice and Title VI populations."

4. Traffic Diversions Due to Projects: At present there are no TIP or Transportation Plan Projects that divert traffic so as to impact EJ areas. A subset of this category may be traffic diversion into EJ areas due to tolling proposals.

As of this writing one tolling related EJ issue has been raised. This concerns the lower income neighborhoods in central Danbury that would, according to a 2009 CT Tolling Study, be impacted by traffic diversion if an I-84 toll was added in central Danbury.

Referring to its EJ evaluation, the CT Tolling Study stated "yes, minor adverse impact in Danbury." HVMPO questioned if the Environmental Justice impact in central Danbury would in actuality exceed the "minor adverse" predicted by the CT Tolling Study.

As the tolling issue proceeds in Connecticut SWRMPO and HVMPO will monitor the EJ impact statements for the process.

5. Interstate Widenings: The EJ impacts of CTDOT plans to widening I-84 and I-95 will be completed by CTDOT when these proposals enter the federally structured environmental impact statement or environmental assessment processes. SWRMPO and HVMPO will evaluate those EJ analyses.

6. Major New Roadways Requiring Relocations: The era of new roadway alignments has historically closed for the WestCOG area; no new expressways are planned.

7. Public Bus Transit: Both the Norwalk Transit District and HARTransit conduct periodic EJ evaluations for their federally funded transit services. These organizations

are voting members on SWRMPO and HVMPO boards. SWRMPO and HVMPO will monitor the EJ evaluations of these closely related organizations, seeking to identify any issues useful to implementing this EJ policy.

8. Larger Projects in General: Whenever federally structured environmental impact statement or environmental assessment processes are required, SWRMPO and HVMPO will evaluate their required EJ analyses.

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4. TITLE VI LIMITED ENGLISH PROFICIENCY

Supplementing the 1964 Civil Rights Act is a 1974 landmark case whereby the United States Supreme Court determined that one specific type of national origin discrimination is that based on a person's inability to speak, read, write, or understand English.

Therefore, concerns about overcoming what is termed Limited English Proficiency (LEP) have become a subset of Title VI compliance law.

Thus this WestCOG, SWRMPO and HVMPO Public Participation Plan is to overcome language barriers by providing language assistance as needed.

Recipients of federal financial assistance are given an obligation to reduce language barriers that can preclude meaningful access by LEP persons to important benefits, programs, information, and services.

The guidelines on LEP are within Executive Order 13166 issued in 2000 and entitled "Improving Access to Services for Persons with Limited English Proficiency." The federal LEP definition refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

As this includes those who have reported to the U.S. Census that they speak English "less than very well, not well, or not at all", American Community Survey data sets are available for analysis thru WestCOG GIS services.

The starting point is an individualized assessment that balances the following nationally standardized four factors as defined below:

Factor 1) The Number or Proportion of LEP Persons Eligible to be Served or Likely to Be Encountered: The U.S. Department of Justice has recommended the following two criteria to identify LEP populations:

FEDERAL STANDARD FOR IDENTIFYING AREAS OF LIMITED ENGLISH PROFICIENCY: A language is considered an LEP language if the language group in a federally defined census tract constitutes 5% or more of total population and speaks English as federally defined "less than very well."

FEDERAL STANDARD FOR IDENTIFYING "SAFE HARBOR" SUBSET OF LIMITED ENGLISH PROFICIENCY: A language falls under the Safe Harbor provision if the language

group in a federally defined census tract reaches the 5% threshold or 1000 individuals, whichever is less, and speaks English as federally defined "less than very well."

As U. S. DOT funding recipients WestCOG, SWRMPO and HVMPO will provide written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons to be served by regional transportation planning.

Using the Census Bureau's American Community Survey resources, WestCOG measured Limited English Proficiency in the census tracts of the SWRMPO and HVMPO federally designated transportation planning regions.

Table "B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over" was analyzed at the sub-municipal census tract level. Note that the census tract is the lowest unit of aggregation available for this data, it is not possible to proceed down to the finer grain of block groups, of which there are several in each census tract.

Using the LEP standards above, tracts were then identified based on the following criteria: 1) 1,000 people speaking an identified non-English language who have limited English proficiency, and 2) 5% of people speaking an identified non-English language who have limited English proficiency.

Note that the Census Bureau's American Community Survey provides consolidated numeration of Spanish and Spanish Creole speakers, also Portuguese and Portuguese Creole speakers. However, the ACS does not consolidate numeration of French and French Creole speakers. In order to provide compatible identification of languages which met the specified criteria, French and French Creole speakers were combined.

The results for the two federal MPO areas is as follows:

SWRMPO LIMITED ENGLISH PROFICIENCY AREAS:
Two Census identified languages met the criteria for at least one census tract within the SWRMPO area. These are Spanish or Spanish Creole and French and French Creole, as follows:

For Spanish and Spanish Creole, the criteria of either 1,000 speakers with limited English proficiency or 5% of population with limited English proficiency, whichever is less, was met in:

1) **Greenwich** for 4 census tracts: 105, 106, 109 and 113
2) **Norwalk** for 13 census tracts: 428, 432-434, 437-445
3) **Stamford** for 17 census tracts: 201, 204, 208, 209, 211, 213 thru 217, then 218.01, 218.02 and 219-223

For French and French Creole, the criteria of either 1,000 speakers with limited English proficiency or 5% of population with limited English proficiency was met in:

1) **Norwalk** for 1 census tract: 445
2) **Stamford** for 3 census tracts: 201, 214 and 218.02

HVMPO LIMITED ENGLISH PROFICIENCY AREAS:

Two Census identified languages met the criteria for at least one census tract within the HVMPO area. These are Spanish or Spanish Creole and Portuguese or Portuguese Creole, as follows:

For Spanish and Spanish Creole, the criteria of either 1,000 speakers with limited English proficiency or 5% of population with limited English proficiency, whichever is less, was met in:

1) **Danbury** for 8 census tracts: 2101-2104, 2106, 2107.01, 2107.02 and 2111
2) **New Milford** for 1 census tract: 2536

For Portuguese or Portuguese Creole, the criteria of either 1,000 speakers with limited English proficiency or 5% of population with limited English proficiency was met in:

1) **Danbury** for 8 census tracts: 2101-2106, 2107.01 and 2107.02

Source: Michael Sullivan of WestCOG GIS

According to the USDOT document "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons", appearing in the Federal Register Volume 70, No. 239, translations of other documents, if needed, can be provided orally.

Further, the Safe Harbor standards should be viewed as minimums when conducting an assessment of language access needs. That is, there may be smaller language groups that need assistance in some transportation study project areas.

Towards that end, some additional information was prepared. Utilizing the same data base as above, a query was made for additional languages present in each MPO area in its entirety, but that fall below Safe Harbor thresholds by the much smaller census tracts. The assumption is that viewed from the larger geography, the smaller language groups can be identified. The results, beneath LEP standards, are as follows:

Total in SWRMPO Area: Russian 844, Chinese 1,369, Italian 1,578 and Polish 1,718.

Total in HVMPO Area: Polish 211, Russian 394, Italian 424 and Chinese 1,018.

SWRMPO and HVMPO will assess language access needs on a per project basis to determine the LEP populations likely to be affected and which outreach measures are appropriate. WestCOG has the GIS mapping and analytical capability in place to accomplish this.

Factor 2. The Frequency with Which LEP Individuals Come in Contact with the Planning Program: SWRMPO and HVMPO use federal and state funding to plan for future transportation projects that can have an impact on the lives of all residents of the two MPO regions.

It is important for LEP persons to be able to participate in the planning process of these projects, particularly during public meetings or public comment periods. Given the record of requests received, frequency is best categorized as "very limited."

As a sub-grantee for transit planning services from WestCOG, the CTDOT authorized annual WestCOG – HARTransit services contract requires HARTransit to provide in-house Spanish and Portuguese translation services to assist HVMPO and SWRMPO in meeting its Title VI translation responsibilities. If French translations are needed they will be provided by an outside commercial source.

The following additional methods are utilized to assist LEP individuals that need language assistance:

-- An "I Speak" card with Spanish, Portuguese and 36 languages is available in the WestCOG office to help visiting LEP persons indicate which language they require assistance in.

-- Interpreter and translator services will be provided, upon request, for all meetings of WestCOG, SWRMPO and HVMPO.

-- WestCOG will translate published materials into another language upon request.

-- The WestCOG web site offers automatic translation into the following languages: Afrikaans, Albanian, Arabic, Armenian, Azerbaijani, Basque, Belarusian, Bengali, Bosnian, Bulgarian, Catalan, Cebuano, Chichewa, Chinese, Croatian, Czech, Danish, Dutch, Esperanto, Estonian, Filipino, Finnish, French, Galician, Georgian, Georgian, German, Greek, Gujarati, Haitian Creole, Hausa, Hebrew, Hindi, Hmong, Hungarian, Icelandic, Igbo, Indonesian, Irish and Italian.

Also, translation into Japanese, Javanese, Kannada, Kazakh, Khmer, Korean, Lao, Latin, Latvian, Lithuanian, Macedonian, Malagasy, Malay, Malayalam, Maltese, Maori, Marathi, Mongolian, Myanmar Burmese, Nepali, Norwegian, Persian, Polish, Portuguese, Punjabi, Romanian, Russian, Serbian, Sesotho, Sinhala, Slovak, Slovenian, Somali, Spanish, Sundanese, Swahili, Swedish, Tajik, Tamil, Telugu, Thai, Turkish, Ukrainian, Urdu, Uzbek, Vietnamese, Welsh, Yiddish, Yoruba and Zulu.

Factor 3. The Nature and Importance of the Program, Activity, or Service Provided by the Program to People's Lives. Within their quarterly transportation reports, staff record the frequency with which LEP persons come into contact with SWRMPO and HVMPO programs.

Over the past three years, there have been no requests for translation services or interpretation services. But it is expected that contact with LEP persons can occur at any time via public meetings, office visits, or phone calls.

Factor 4. The Resources Available to the Grantee/Recipient and Costs. The resources available for assisting LEP populations are described throughout this document.

WestCOG, SWRMPO and HVMPO have sufficient financial resources to provide the LEP services and assistance they propose to offer.

5: PUBLIC PARTICIPATION PLAN

5A. OVERALL POLICY

Pursuant to Title 23 of the Code of Federal Regulations, Section 450.316, federal transportation planning rules require that WestCOG, SWRMPO and HVMPO maintain the Public Participation Plan as detailed below. The policy objectives for that Plan are to:

--- *Educate and inform the public about transportation planning, projects, and issues within their communities and the region.*

--- *Involve the public in the transportation planning process.*

--- *Ensure that information is easily accessible to all interested parties in the community.*

--- *Improve the decision making process to include the interest/needs of stakeholders through informed consent.*

--- *Continue to evaluate and improve public participation strategies.*

Within federal law Title 23, Code of Federal Regulations 450.316, is the statement that "a minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted by the MPO."

Therefore, SWRMPO and HVMPO will place public notices in this regard and allow for the required comment period prior to considering adopting or making any changes to this Public Participation Plan.

During the 45-day comment period the WestCOG Technical Advisory Group will review any proposed revisions to the Public Participation Plan and provide comment to HVMPO and SWRMPO.

5B. ADMINISTRATIVE PROCEDURES

Where to Direct Inquiries: All questions and comments regarding access to WestCOG, SWRMPO and HVMPO may be directed to Nicole Sullivan, phone at 475-323-2071, email nsullivan@westcog.org or by surface mail at the letterhead address.

Public Access to Hard Copy Documents: Public access to HVMPO and SWRMPO hard copy transportation documents is available at the WestCOG office 8:30 AM to 4:30 PM Monday thru Friday, evenings by appointment, or through direct surface mail.

Public Access to Digital Documents: Public access to HVMPO and SWRMPO digital transportation documents is available. Internet access is available at https://WestCOG.org/transportation/. Inquire by email to nsullivan@westcog.org.

Public Participation Element in Studies: Each SWRMPO or HVMPO study will include a significant public participation component, outlined in the study work program in detail.

Improve Public Participation Plan: This Public Participation Plan will be reviewed periodically to assure full and open access to all. At a minimum, these policies will be reviewed every time the SWRMPO and HVMPO Regional Transportation Plans or Transportation Improvement Programs are updated, that schedule determined by federal rules.

TIP and Plan Public Comment Periods: Mailings and placement of public notices will be scheduled such that the public comment period will be at least 30 days for the Regional Transportation Plan and at least 30 days for the Transportation Improvement Program.

The 30 days will be scheduled to be completed prior to the date of SWRMPO or HVMPO voting as to approval or disapproval of these documents.

TIP and Plan Legal Notices Placed in Media: Concerning pending adoption of SWRMPO and HVMPO Regional Transportation Plans and Transportation Improvement Programs, to alert citizens and advocacy groups in advance, a legal notice regarding upcoming adoption will be placed in major newspapers.

For HVMPO, this will be:
-- Regional newspaper the Danbury News Times
-- Alternative language newspaper La Tribuna

For SWRMPO, this will be:
-- Regional newspaper the Stamford Advocate
-- Regional Newspaper the Norwalk Hour
-- Alternate language newspaper La Voz Hispania

The two paragraphs below will be included within the legal notice:

The (Draft Transportation Improvement Program or Regional Transportation Plan) is being updated and will be considered for re-endorsement at the (SWRMPO or HVMPO) meeting on xxx xxx. It is being circulated beforehand to insure that community concerns are properly included.

Also being circulated are the (Draft Transportation Improvement Program or Regional Transportation Plan) Draft Air Quality Conformity Determinations for Ozone and Particulates. The Draft Air Quality Conformity Determinations are available for inspection at westernctcog.org or at the WestCOG office. Comments on air quality conformity may be made to WestCOG or at the (Draft Transportation Improvement Program or Regional Transportation Plan) public information meeting as noticed below."

TIP and Plan Media Releases: These will be forwarded via email to the media outlets serving the SWRMPO and HVMPO areas. Citizens and advocacy groups commonly review notices in these media sources in order to alert themselves to growth, transportation and development issues. The notice will be written in clear and welcoming language.

For HVMPO, at a minimum these media outlets will be contacted:
-- Brookfield Patch: media@patch.com
-- New Fairfield Citizen News: citizennews@aol.com
-- Litchfield County Times: news@countytimes.com
-- La Tribuna in Danbury: editor@tribunact.com
-- Danbury News Times: newsstaff@newstimes.com

-- Greater New Milford Spectrum: drose@newstimes.com

-- Newtown Bee: editor@thebee.com
-- Redding Pilot: pilot@thereddingpilot.com
-- Ridgefield Press: newsroom@ridgefieldpress.com
-- WLAD Radio: wladnewsroom@yahoo.com

For SWRMPO, at a minimum these media outlets will be contacted:
-- Darien Times: newsroom@darientimes.com
-- Darien Daily Voice: darien@dailyvoice.com
-- Greenwich Time: letters@greenwichtime@scni.com
-- New Canaan News Online: newsroom@newcanaannewsonline.com
-- New Canaan Daily Voice: NewCanaan@dailyvoice.com

-- The Norwalk Hour: editor@thehour.com
-- Stamford Advocate: editor@stamfordadvocate.com/news/
-- La Voz Hispania de Connecticut: editor@lavozhispanact.com/
-- CT Latino News: editor@ctlatinonews.com
-- Westport Minuteman: editor@minutemannewscenter.com/westport/

-- Westport News: jschwing@ctpost.com
-- Westport Daily Voice: westport@dailyvoice.com
-- Weston Forum: editor@westonforum.com
-- Wilton Villager: editor@thehour.com/wilton_villager/

TIP and Plan Public Information Meetings: For the draft TIP and draft Transportation Plan, in addition to the other participation mechanisms, SWRMPO and HVMPO will hold public information meetings.

Such public information meetings will be held during the 30-day public comment period. SWRMPO and HVMPO will advertise the public information meeting dates within legal notices defining the public comment period.

Notices to the public as to public meeting and hearings will be posed to the WestCOG web site.

TIP and Plan Technical Advisory Committee Review: The WestCOG Technical Advisory Group will review draft TIP and Plan documents and provide comment to HVMPO and SWRMPO.

TIP and Plan Summary of Public Comments: When written or oral comments are received on the draft TIP or Transportation Plan as a result of the public involvement process, a summary, analysis, and report on the disposition of each comment shall be made part of the final TIP or Plan.

In addition, when the SWRMPO or HVMPO approved Transportation Improvement Program or approved Regional Transportation Plan is transmitted to CTDOT, all air quality conformity report comments from the public will be incorporated into the transmission and made part of the final TIP or Plan.

TIP and Plan Changes After Draft Reviewed: If the final Transportation Improvement Program or Regional Transportation Plan either differs significantly from the ones which were first made available for public comment, or if they raise new material issues which interested parties could not reasonably have foreseen, an additional opportunity for public comment will be made available.

6. VITAL DOCUMENTS TRANSLATED

There is more opportunity than in earlier years to maximize flexibility in the distribution of Title VI documents utilizing PowerPoint formats, graphics, web sites and links, emails, other digital documents, as well as traditional hard copy posters and flyers.

To accomplish this, staff will copy and insert the texts below into the media appropriate for the Title VI objective. This is a more flexible and modern format than using a primary format of poster or page size.

The vital documents below are points of entry into the WestCOG federal transportation planning program. Thus for Title VI purposes they have been translated into Spanish, Portuguese and French. The reasoning for the selection of these languages was documented earlier.

As already noted to insure flexibility of use in this digital age, staff will copy and insert them as needed into the digital or hard copy media appropriate for their Title VI Compliance Plan objective.

Please understand that the small font size utilized below is not meant to be the size at which these texts are ultimately presented to the public. Rather, the small size is for efficient storage in this text document until "cut and paste" usage by various staff persons as they meet Title VI requirements within the program.

6A. TRANSLATED TEXT TO ACCESS SWRMPO TRANSPORTATION PLAN

ENGLISH: The South Western Region Metropolitan Planning Organization (SWRMPO) is pleased to announce the endorsement of Going Forward – The Plan to Maintain & Improve Mobility. Going Forward is the official Long Range Transportation Plan for the South Western Region, covering the time period between, 2015-2040.

Going Forward provides a "blueprint" for transportation investment in the eight towns of the South Western Region: Darien, Greenwich, New Canaan, Norwalk, Stamford, Weston, Westport, and Wilton. Going Forward serves as a guide for developing a transportation system that is accessible, safe, and reliable, thereby contributing to a higher quality of life for the Region's residents.

ESPAÑOL: La Organización occidental del sur Región Metropolitana de Planificación (SWRMPO) se complace en anunciar la aprobación de Going Forward - El plan para mantener y mejorar la movilidad. De cara al futuro es el plan oficial de Transporte a Largo Plazo para la región occidental del sur, que abarca el período de tiempo entre, 2015-2040.

Avanzando proporciona un " modelo " para la inversión de transporte en los ocho municipios de la región occidental del sur: Darien, Greenwich, Nueva canaan, Norwalk, Stamford, Weston, Westport, y Wilton. De cara al futuro sirve como una guía para el desarrollo de un sistema de transporte que sea accesible, seguro y fiable, lo que contribuye a una mejor calidad de vida para la región residentes.

PORTUGUÊS: O Ocidental Região Metropolitana Organização Planeamento do Sul (SWRMPO) tem o prazer de anunciar o endosso de Avançando. Daqui para frente é o funcionário Plano de Longo Alcance Transporte para a Região Ocidental do Sul, que abrange o período de tempo entre, 2015-2040.

Vai para a frente proporciona um "modelo" para o investimento transporte nas oito cidades do Sul Western Region: Darien, Greenwich, Nova Canaan, Norwalk, Stamford, Weston, Westport, e Wilton. Indo para a frente serve como um guia para o desenvolvimento de um

sistema de transporte que é acessível, seguro e confiável, contribuindo assim para uma maior qualidade de vida para os moradores da região.

FRANCAIS: L'Organisation du Sud - Ouest Région métropolitaine de planification (SWRMPO) est heureuse d'annoncer l'approbation de Going Forward - Le plan pour maintenir et améliorer la mobilité. Aller de l' avant est le plan officiel de transport à longue distance pour la région du Sud - Ouest, couvrant la période de temps entre, 2015-2040.

Aller de l'avant fournit un " plan " pour les investissements dans les transports dans les huit villes de la région du Sud - Ouest: Darien, Greenwich, New Canaan, Norwalk, Stamford, Weston, Westport, et Wilton. Aller de l'avant sert de guide pour l'élaboration d' un système de transport qui est accessible, sûr et fiable, contribuant ainsi à une meilleure qualité de vie pour la région ' habitants.

6B. TRANSLATED TEXT TO ACCESS HVMPO TRANSPORTATION PLAN

ENGLISH: 2015-2040 Regional Transportation Plan for the Housatonic Valley Region, 2015: This regional transportation plan is a statement by the Housatonic Valley Region's municipal chief elected officials, serving as the area's federally recognized regional agency for transportation planning, as to what investments and strategies are needed to improve and balance mobility within the Region.

The Plan is a prerequisite for federal transportation funding. It is the result of a transportation planning process designed to increase the public's awareness of transportation matters. It provides all parties with a welcoming point of contact with transportation investment decision making.

ESPAÑOL: 2015-2040 Planes de Transporte a Largo Plazo, 2015: Plan Regional de Transporte HVEste plan de transporte regional es una declaración de la Región del Valle de Housatonic ' principales funcionarios municipales s elegido, que sirve como el área de ' organismo regional reconocida federalmente s para la planificación del transporte, en cuanto a lo que se necesitan inversiones y estrategias para mejorar la movilidad equilibrio dentro de la Región.

El plan es un requisito previo para la financiación federal de transporte. Es el resultado de un proceso de planificación de transporte diseñado para aumentar el público ' conciencia de s materia de transporte. Proporciona todas las partes con un punto de contacto con la toma de decisiones de inversión de transporte acogedor.

PORTUGUÊS: 2015-2040 Planos de Transporte de longo alcance, 2015: Plano de Transporte Regional HVEste plano de transporte regional é uma declaração municipais funcionários chefe eleitos do Vale região Housatonic, servindo como agência regional federal reconhecido da área para planejamento de transporte, como o que os investimentos e estratégias são necessárias para melhorar e mobilidade equilíbrio dentro da Região.

O Plano é um pré É o resultado de um processo de planejamento de transporte projetado para aumentar a consciência do público sobre questões de transporte. Ele fornece todas as partes com um ponto de boas.

FRANCAIS: 2015-2040 Ce plan de transport régional est une déclaration de la Région Vallée Housatonic ' chef municipal s élus, servant de la zone ' agence régionale reconnue au niveau fédéral de la planification des transports, à ce que les investissements et les stratégies sont nécessaires pour améliorer la mobilité de l' équilibre dans la région.

Le plan est une condition préalable au financement fédéral de transport. Il est le résultat d'un processus de planification de transport conçu pour augmenter le public ' sensibilisation s des questions de transport. Il fournit toutes les parties avec un point de contact avec les investissements dans les transports prise de décision accueillant.

6C. TRANSLATED TEXT TO ACCESS TRANSPORTATION IMPROVEMENT PROGRAMS

ENGLISH: The Transportation Improvement Program (TIP) is four-year financially constrained listing of all federal funded and regionally significant transportation projects. The

TIP is developed in cooperation with federal and state agencies, including the Connecticut Department of Transportation (CTDOT), area municipalities, and transit operators in the region.

The TIP is multimodal and includes funding for transit, highway, and bicycle/pedestrian projects, among others. The TIP also serves as the vehicle for implementation of goals and objectives identified in regional Long Range Transportation Plan. The TIP is part of the Statewide TIP (STIP), and is a living document that adjusts to project changes with input from the Metropolitan Planning Organization (MPO).

ESPAÑOL: El Programa Transporte (TIP) es de cuatro - año la lista de restricciones financieras de todos los proyectos de transporte financiados y regionalmente significativos federales. El TIP es desarrollado en cooperación con las agencias federales y estatales, incluyendo el Departamento de Transporte de Connecticut (CTDOT), los municipios de la zona, y los operadores de transporte público en la región.

El TIP es multimodal e incluye la financiación para proyectos de tránsito, carretera y bicicletas / peatones, entre otros. El TIP también sirve como vehículo para la aplicación de las metas y objetivos identificados en la región Plan de Transporte a Largo Plazo. El TIP es parte del todo el estado TIP (PICP), y es un documento vivo que se adapta a los cambios con la entrada del proyecto Organización de Planificación Metropolitana (MPO).

PORTUGUÊS: The Programa Transportation Improvement (TIP) é de quatro anos de listagem restrição financeira de todos os projetos de transporte financiados e regionalmente significativas federais. A dica é desenvolvido em cooperação com agências federais e estaduais, incluindo o Departamento de Transportes dos Connecticut (CTDOT), municípios da área, e operadores de trânsito na região.

A dica é multimodal e inclui o financiamento de projectos de trânsito, estrada e bicicleta / pedestre, entre outros. O TIP também serve como o veículo para a implementação de metas e objetivos identificados na região Plano de Transporte de longo alcance. O TIP é parte da Statewide TIP (STIP), e é um documento vivo, que se ajusta para projetar mudanças com a entrada do Metropolitan Organization Planning (MPO).

FRANCAIS: Le Programme Transport Improvement (TIP) est de quatre - année fiche contraintes financières de tous les projets de transport financés et régionaux importants fédéraux. Le TIP est développé en coopération avec les organismes fédéraux et de l'Etat, y compris le Connecticut Department of Transportation (CTDOT), les municipalités de la région, et les opérateurs de transport en commun dans la région.

Le TIP est multimodal et comprend le financement des projets en commun, autoroutes, et le vélo / piéton, entre autres. Le TIP sert également de véhicule pour la mise en œ la région Plan de transport à longue distance. Le TIP est une partie de la Statewide TIP (STIP), et est un document vivant qui ajuste pour projeter des changements avec l' entrée de l' Organisation de planification urbaine.

6D. TRANSLATED TEXT TO ACCESS METROPOLITAN PLANNING ORGANIZATIONS

ENGLISH: WestCOG currently has two Metropolitan Planning Organizations (MPOs). MPOs are the federally mandated organizations designated by the Governor as the forum for cooperative transportation decision-making. These MPOs represent the two former regions that make up WestCOG, the South Western Region MPO and the Housatonic Valley MPO.

ESPAÑOL: WestCOG actualmente tiene dos Organizaciones de Planificación Metropolitana (MPOs). MPOs son las organizaciones de mandato federal designados por el gobernador como el foro para la toma de transporte cooperativo - decisiones. Estos MPO representan las dos antiguas regiones que componen WestCOG, la Región Sur Occidental MPO y el valle de Housatonic MPO.

PORTUGUÊS: WestCOG tem atualmente duas Organizações planejamento metropolitano (MPOs). MPOs são as organizações mandato federal designados pelo Governador como o

fórum para o transporte cooperativa de tomada de decisão. Estes MPOs representam os dois ex.

FRANCAIS: WestCOG dispose actuellement de deux organisations Metropolitan Planning (MPOs). MPOs sont les organismes mandatés par le gouvernement fédéral désignés par le gouverneur en tant que forum pour le transport coopératif prise de décision. Ces MPOs représentent les deux anciennes régions qui composent WestCOG, le Sud-Ouest de la région MPO et la Housatonic Valley MPO.

6E. TRANSLATED TEXT TO APPEAR ON MPO AND WESTCOG AGENDAS

ENGLISH: For language assistance or other accommodations, contact Western Connecticut Council of Governments at least five business days prior to the meeting at help@westcog.org.

ESPAÑOL: Para asistencia con el idioma y otras adaptaciones, por favor póngase en contacto con WestCOG por lo menos cinco días hábiles antes de la reunión al help@westcog.org.

PORTUGUÊS: Para obter assistência língua ou outras acomodações, entre em contato com WestCOG pelo menos cinco dias úteis antes da reunião em help@westcog.org.

FRANCAIS: Si des informations supplementaries sont necessaires dans une autre langue, contactez help@westcog.org.

6F: NOTICE OF COMPLAINT PROCEDURE IN ENGLISH, SPANISH, PORTUGUESE AND FRENCH

IN ENGLISH: In accordance with Title VI of the Civil Rights Act of 1964, WestCOG operates its programs without regard to race, color and national origin. WestCOG has an established process in place to deal with complaints of discrimination. For more information about WESTCOG obligations under Title VI, or if you have a complaint, contact N. Sullivan at 475-323-2071.

IN SPANISH: De acuerdo con el Titulo VI del Acta de Derechos Civiles de 1964, WestCOG ofrece sus servicos a personas de cualquier raza, color o nacionalidad. WestCOG ha establecido un proceso para resolver comentarios relacionados con la discriminación. Para más información sobre las obligaciones de WestCOG bajo el Titulo VI, o si tiene algún comentario sobre el tema, comuníquese con N. Sullivan al 475-323-2071.

IN PORTUGUESE: De acordo com o Título VI da Lei dos Direitos Civis de 1964, o WestCOG opera seus programas sem preconceito de raça, cor ou nacionalidade. O WestCOG tem um processo reputável em vigor para lidar com denúncias de discriminação. Para obter mais informações sobre as obrigatoriedades da WestCOG sob o Título VI, ou se você tem uma denúncia a fazer, entre em contato com N. Sullivan pelo telefone 475-323-2071.

IN FRENCH: Conformément au titre VI du Civil Rights Act de 1964, WestCOG exploite ses programmes sans égard à la race, la couleur et l'origine nationale. WestCOG a établi un processus en place pour traiter les plaintes de discrimination. Pour de plus amples renseignements sur les obligations WestCOG en vertu du titre VI, ou si vous avez une plainte, communiquez avec N. Sullivan au 475-323-2071.

6G: TITLE VI COMPLAINT FORM IN ENGLISH, SPANISH, PORTUGUESE AND FRENCH

IN ENGLISH: TITLE VI COMPLAINT FORM. Submit this form to WestCOG within 180 days of the alleged occurrence or 180 days from when the alleged occurrence became known.
Complainants Name:
Street Address:
City/State/Zip:
Phone:
•
Were you discriminated against because of:
- Race, Color, Ethnicity
- National Origin
- Limited English

- Low Income
- Age
- Disability
- Other Reasons

•

Date(s) of the Incident:
Please provide the location of the alleged discrimination, the name(s) of the individual(s) who allegedly discriminated against you. Please provide the names, addresses and telephone numbers of any witnesses.

Explain as clearly as possible what happened and how you were discriminated against. If more space is needed, please use the back of the form.

•

Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? ___Yes ____No

Note that complaints may also be field with the CT DOT Office of Contract Compliance, Debra Goss, Title VI Coordinator, 2800 Berlin Turnpike, Newington, CT 06111. If yes as to additional filings, check all that apply: ___Federal Agency/ ___Federal Court/ ___State Agency/ ___State Court/ ___Local Agency

•

Please provide information about a contact person at the agency/court where the complaint was filed.
Name
Address
City, State and Zip Code
Telephone Number

•

Please sign and date below. You may attach any written materials or other information that you think is relevant to your complaint.
Signature:
Date:

•

Submit this complaint to: Nicole Sullivan, Title VI Coordinator, Western CT Council of Governments, 1 Riverside Road, Newtown, CT 06482, nsullivan@westcog.org, telephone/fax 475-323-2071.

IN SPANISH: TÍTULO VI FORMULARIO DE RECLAMO. Envíe este formulario a WestCOG dentro de los 180 días del supuesto hecho o 180 días después de haberse conocido el supuesto hecho
Nombre del denunciante:
Dirección:
Ciudad/Estado/Zip:
Teléfono:

•

Fue discriminado a causa de:
- Raza, Color, Origen Étnico
- Origen Nacional
- Limitaciones con el Inglés
- Bajos Ingresos
- Edad
- Discapacidad
- Otras Razones

•

Fechas(s) del Incidente:
Por favor, proporcione la ubicación donde ocurrió la supuesta discriminación, nombre(s) de la(s) persona(s) que supuestamente lo discriminaron.

Por favor, proporcione los nombres, direcciones y teléfonos de cualquier testigo.
Explique en la forma más clara posible lo que pasó y cómo fue discriminado. Si necesita más espacio por favor utilice el reverso del formulario.

•

¿Usted ya presentó este reclamo en algún otro estado o agencia federal, estatal o local, o en alguna corte federal o estatal? ____Si ____No

Tome en cuenta que también puede presentar sus reclamos a CT DOT Office of Contract Compliance, Debra Goss, Title VI Coordinator, 2800 Berlin Turnpike, Newington, CT 06111. Si ya presentó reclamos anteriores, marque todo lo que aplique: ___Agencia Federal / ___Corte Federal/ ___Agencia Estatal / ___Corte Estatal / ___Agencia Local

•

Por favor proporcione la información de alguna persona de contacto en la agencia/corte donde usted sentó el reclamo.
Nombre
Dirección
Ciudad, Estado y Código Postal
Número de Teléfono

•

Por favor firme y coloque la fecha a continuación. Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para a su reclamo.
Firma:
Fecha:

•

Presente este reclamo a: Nicole Sullivan, Title VI Coordinator, Western CT Council of Governments, 1 Riverside Road, Newtown, CT 06482, nsullivan@westcog.org, telephone/fax 475-323-2071.

IN PORTUGUESE: TÍTULO VI FORMULÁRIO DE RECLAMAÇÃO. Envie este formulário para o WestCOG em até 180 dias após a ocorrência ou 180 dias após a ocorrência ter sido divulgada.
Nome do (a) reclamante:
Endereço:
Cidade/Estado/CEP:
Telefone:

•

Você foi discriminado (a) por:
- Raça, Cor, Etnia
- Nacionalidade
- Limitação do Idioma Inglês
- Baixa Renda
- Idade
- Deficiência
- Outras Razões

•

Data(s) do Ocorrido:
Informe o local do ocorrido e o(s) nome(s) da(s) pessoa(s) que supostamente cometeu/cometeram o ato de discriminação contra você. Informe os nomes, endereços e telefones das testemunhas.

Apresente, da forma mais clara possível, o que aconteceu e como você foi discriminado (a). Se precisar de mais espaço, use o verso do formulário.

•

Você enviou essa reclamação a algum outro órgão federal, estadual ou local ou a algum tribunal federal ou estadual?
____Sim ____Não

Observe que a reclamação também pode ser endereçada ao CT DOT Office of Contract Compliance, aos cuidados de Debra Goss, Title VI Coordinator, 2800 Berlin Turnpike, Newington, CT 06111. Caso já tenha apresentado a reclamação, informe para onde a enviou: ___Agência Federal/ ___Tribunal Federal / ___ Agência Estadual / ___ Tribunal Estadual/ ___ Agência Local

•

Por favor, preencha as informações da pessoa de contato no órgão/tribunal onde a reclamação foi realizada.
Nome

Endereço
Cidade, Estado e CEP
Telefone
•
Por favor, assine e coloque a data abaixo. Você pode anexar informações escritas ou qualquer outra que julgue relevante em sua reclamação.
Assinatura:
Data:
•
Envie esta reclamação para: Nicole Sullivan, Title VI Coordinator, Western CT Council of Governments, 1 Riverside Road, Newtown, CT 06482, nsullivan@westcog.org, telephone/fax 475-323-2071.

IN FRENCH: FORMULAIRE DE PLAINTE TITRE VI. Soumettre ce formulaire WestCOG dans les 180 jours de l'apparition présumée ou 180 jours à compter de la survenance alléguée est devenu connu.
Plaignants Nom:
Adresse de rue:
Code postal:
Téléphone:
•
Avez-vous été victime de discrimination en raison de:
- Race, Couleur, Noir
- Origine nationale
- Limitée de l'anglais
- Faible revenu
- Age
- invalidité
- Autres raisons
•
Date (s) de l'incident:
S'il vous plaît fournir l'emplacement de la discrimination alléguée, le nom (s) de l'individu (s) qui aurait fait preuve de discrimination contre vous. S'il vous plaît fournir les noms, adresses et numéros de téléphone de tous les témoins.

Expliquez aussi clairement que possible ce qui est arrivé et comment vous avez été victime de discrimination. Si plus d'espace est nécessaire, s'il vous plaît utiliser le verso du formulaire.
•
Avez-vous déposé cette plainte auprès de tout autre, un état ou organisme local fédéral, ou auprès d'un tribunal fédéral ou d'État? ___Oui ___Non

Notez que les plaintes peuvent aussi être le terrain avec le CT DOT Office of Contract Compliance, Debra Goss, Title VI Coordinator, 2800 Berlin Turnpike, Newington, CT 06111. Si oui que les dépôts supplémentaires, cochez toutes les cases: ___Agence Federal / ___Federal Cour / Agence ___State / ___State Cour / Agence ___Local
•
S'il vous plaît fournir des informations sur une personne de contact à l'agence / cour où la plainte a été déposée.
prénom
Adresse
Ville, État et code postal
Numéro de téléphone
•
S'il vous plaît signer et dater ci-dessous. Vous pouvez joindre tous les documents écrits ou d'autres informations que vous jugez pertinentes à votre plainte.
Signature:
Date:
•
Envoyer cette plainte à: Nicole Sullivan, Title VI Coordinator, Western CT Council of Governments, 1 Riverside Road, Newtown, CT 06482, nsullivan@westcog.org, telephone/télécopieur 475-323-2071.

7. APPENDIX FOR MAPS AND COMPLAINT LOG

7A. MAPS OF ENVIRONMENTAL JUSTICE AREAS

INSERT ONE: Danbury for 9 census tracts: 2101 thru 2106, 2107.01, 2107.02 and 2112

INSERT TWO: Greenwich for 1 census tract: 113; Norwalk for 8 census tracts: 434, 437, 438, 440 thru 442, 444 and 445; Stamford for 14 census tracts: 201, 209, 211, 214 thru 217, 218.01, 218.02, and 219 thru 223

7B. MAPS OF SPANISH SPEAKERS WITH LIMITED ENGLISH PROFICIENCY

INSERT ONE: New Milford for 1 census tract: 2536

INSERT TWO: Danbury for 8 census tracts: 2101-2104, 2106, 2107.01, 2107.02 and 2111;

INSERT THREE: Greenwich for 4 census tracts: 105, 106, 109 and 113; Norwalk for 13 census tracts: 428, 432-434, 437-445; Stamford for 17 census tracts: 201, 204, 208, 209, 211, 213 thru 217, then 218.01, 218.02 and 219-223

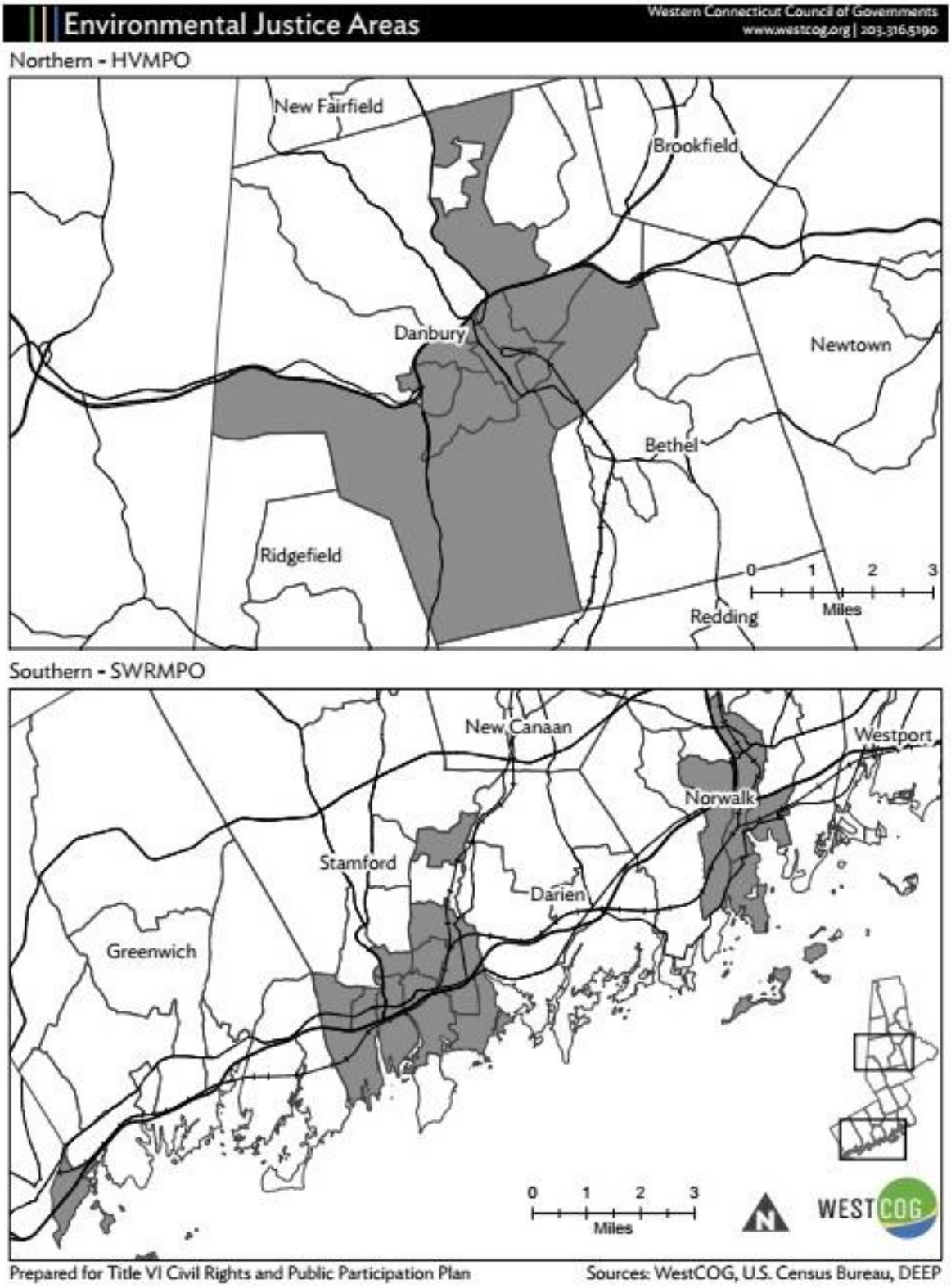
7C. MAPS OF PORTUGUESE AND FRENCH SPEAKERS WITH LIMITED ENGLISH PROFICIENCY

INSERT ONE PORTUGUESE: Danbury for 8 census tracts: 2101-2106, 2107.01 and 2107.02

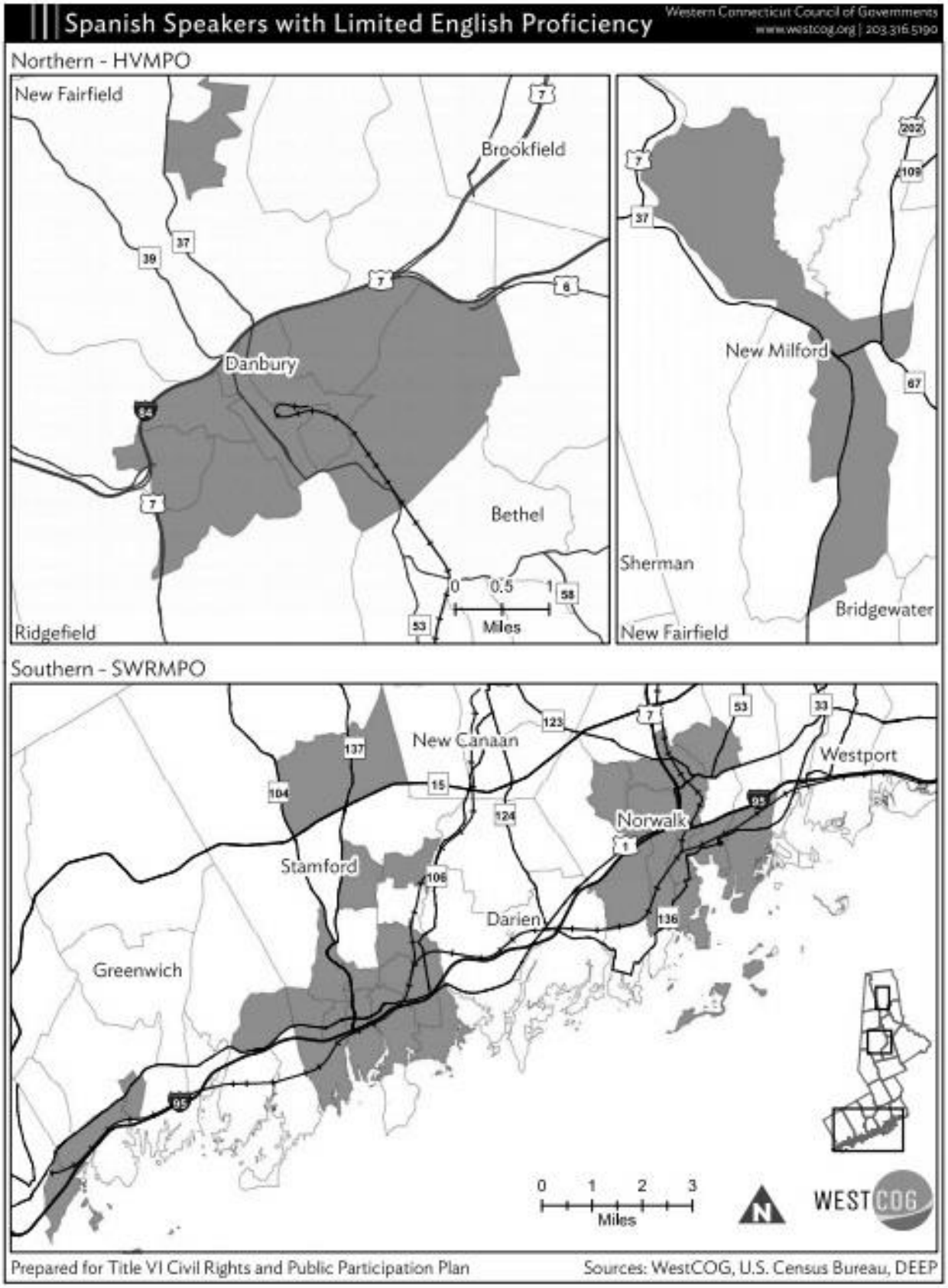
INSERT TWO FRENCH: Norwalk for 1 census tract: 445; Stamford for 3 census tracts: 201, 214 and 218.02

7D. LOG FOR TITLE VI COMPLAINTS

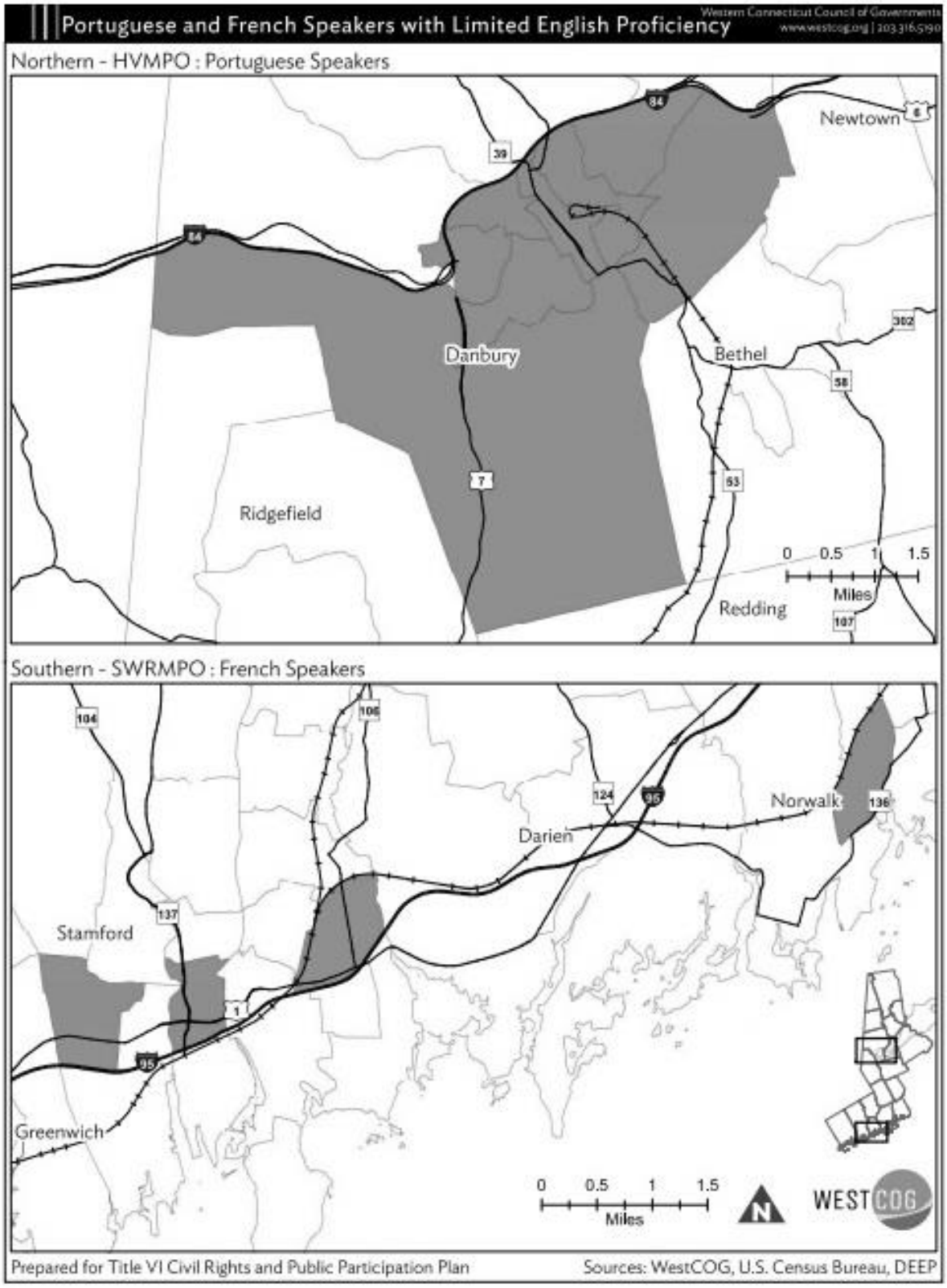
APPENDIX 7A


Environmental Justice Areas
Western Connecticut Council of Governments
www.westcog.org | 203.316.5190
Northern - HVMPO
New Fairfield
Brookfield
Danbury
Newtown
Bethel
Ridgefield
Redding
0 1 2 3
Miles
Southern - SWRMPO
New Canaan
Westport
Norwalk
Stamford
Darien
Greenwich
0 1 2 3
Miles
N
WESTCOG
Prepared for Title VI Civil Rights and Public Participation Plan
Sources: WestCOG, U.S. Census Bureau, DEEP

APPENDIX 7B


Spanish Speakers with Limited English Proficiency
Western Connecticut Council of Governments
www.westcog.org | 203.316.5190
Northern - HVMPO
New Fairfield
Brookfield
Danbury
Bethel
Ridgefield
New Milford
Sherman
Bridgewater
New Fairfield
0 0.5 1
Miles
Southern - SWRMPO
New Canaan
Westport
Norwalk
Stamford
Darien
Greenwich
0 1 2 3
Miles
N
WESTCOG
Prepared for Title VI Civil Rights and Public Participation Plan
Sources: WestCOG, U.S. Census Bureau, DEEP

APPENDIX 7C


Portuguese and French Speakers with Limited English Proficiency
Western Connecticut Council of Governments
www.westcog.org | 203.316.5190
Northern - HVMPO : Portuguese Speakers
Newtown
Danbury
Bethel
Ridgefield
Redding
0 0.5 1 1.5
Miles
Southern - SWRMPO : French Speakers
Norwalk
Darien
Stamford
Greenwich
0 0.5 1 1.5
Miles
WESTCOG
Prepared for Title VI Civil Rights and Public Participation Plan
Sources: WestCOG, U.S. Census Bureau, DEEP

APPENDIX 7D

WESTCOG LOG

OF TITLE VI COMPLAINTS,

INVESTIGATIONS AND LAWSUITS

Indicating data to be gathered by type of event

|

	DATE	SUMMARY, INCLUDING BASIS OF COMPLAINT	STATUS	ACTIONS TAKEN
Investigations:				
1.				
2.				
3.				
4.				
Lawsuits:				
1.				
2.				
3.				
4.				
Complaints:				
1.				
2.				
3.				
4.				