

# Western Connecticut Council of Governments

## Title VI Compliance Plan

AUGUST 2025

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# INTRODUCTION

This document, henceforth referred to as the ‘Plan’, covers Title VI Compliance.

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 Title VI compliance procedures 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 these 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.

The Housatonic Valley MPO (HVMPO) 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 Plan.

The [Public Involvement Plan](#), which outlines the strategies used to engage and involve the public in the planning process, can be found separately.

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

## 1. OVERVIEW

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 and ensures that no person is excluded from participation in, denied the benefits of, or be subjected to discrimination in programs or 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.

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 have developed 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 Title VI Coordinator, who will be responsible for the day-to-day collection, analysis, and reporting of Title VI related data. The Title VI Coordinator will conduct compliance and program reviews to ensure that SWRMPO, HVMPO and WestCOG are adhering to the procedures outlined in this Plan.

## 2. COMPLAINT PROCEDURE

This procedure is used to manage and evaluate complaints received on the Title VI & Related Programs Discrimination Complaint Form. See Section 1E for the forms in English, Spanish, and Portuguese. 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 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. In addition to Title VI, there are other Nondiscrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (sex), Age Discrimination Act of 1975 (age), and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act of 1990 (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 forward the complaint form to CTDOT upon receipt and maintain the Title VI Complaint Log.

In cases in which the complaint is against one of WestCOG's sub recipients of federal funds, the Title VI Coordinator will forward the complaint form to CTDOT upon receipt and maintain the Title VI Complaint Log.

### **INFORMATION TO INCLUDE**

- A. The complaint may be filed by the affected party or a representative in text communication. The complaint may also be filed on a computer disk, by audio file, or in Braille.
- B. 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.
- C. The complaint must be filed within 180 calendar days of the alleged occurrence(s) or when the alleged discrimination became known to the complainant.
- D. All complaints will be accepted. After acceptance the complaint will be reviewed to determine whether or not it is a Title VI complaint.
- E. Include the location and date of the alleged act of discrimination.
- F. Include the date when the complainant became aware of the alleged discrimination.
- G. 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.
- H. A detailed description of the incident.
- I. 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:

Victoria Ricks  
Western CT Council of Governments  
1 Riverside Road, Sandy Hook, CT 06482  
Email [vricks@westcog.org](mailto:vricks@westcog.org)  
Telephone/Fax 475-323-2056

### 3. FHWA INVESTIGATION OF COMPLAINTS

This section details the process WestCOG will utilize to address Title VI complaints, ensuring due process for complainants and respondents.

To maximize internal office coordination and enhance compliance, all WestCOG, SWRMPO and HVMPO Title VI activities are directed to one staff person, Victoria Ricks, phone at 475-323-2056 and email at [vricks@westcog.org](mailto:vricks@westcog.org).

Any complaints received by the Title VI Coordinator will be immediately copied to the CTDOT Title VI Coordinator, CTDOT Office of Contract Compliance, 2800 Berlin Turnpike, Newington, CT 06111. The complaint will then be forwarded to the FHWA Office of Civil Rights, 1200 New Jersey Avenue, SE, 8<sup>th</sup> Floor E81-105, Washington, DC 20590.

Concerning any aspect of Title VI, note that the public also has the right to file complaints directly with the CTDOT Title VI Coordinator and FHWA Office of Civil Rights

As required by CTDOT, a log format has been created for registering Title VI complaints, investigations, and lawsuits (*Figure 1*). All complaints will receive a case number and all information pertaining to the case will be logged in.

SWRMPO and HVMPO will make reasonable efforts to obtain swift 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.

**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.				

Figure 1: WestCOG Log of Title VI Complaints, Investigations and Lawsuits

## 4. 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 basis of any class or characteristic protected by federal or state law."*

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 Compliance Plan and the Public Involvement Plan.

**Demographic Data Collection and Analysis:** 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.

Additionally, on occasion surveys are used to understand public sentiment for specific planning studies. Questions regarding the participant's demographic information are included but are voluntary.

**Office Posting:** A Title VI posting is on display in the office entrance area. Text shown in 1E.

**Participation:** WestCOG, SWRMPO, and HVMPO will seek to have participation from a broad set of stakeholders and formal representation on committees and working groups.

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

**Notices Available on Website:** As part of this Plan web posting are maintained. The link for access is <https://westcog.org/reports-audits/public-participation-titlevi/>.

## 5. TITLE VI DOCUMENTS

Title VI documents, including the Complaint Procedure Notice, Title VI Complaint Form, and the Title VI Public Notice are available in English and have also been translated into Spanish and Portuguese.

### **NOTICE OF COMPLAINT PROCEDURE**

**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 V. Ricks at 475-323-2056 or at [vricks@westcog.org](mailto:vricks@westcog.org).

**ESPAÑOL:** De acuerdo con el Título VI del Acta de Derechos Civiles de 1964, WestCOG ofrece sus servicios 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 Título VI, o si tiene algún comentario sobre el tema, comuníquese con V. Ricks al 475-323-2056 o en [vricks@westcog.org](mailto:vricks@westcog.org).

**PORTUGUÊS:** De acordo com o Título VI da Lei dos Direitos Cíveis 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 V. Ricks pelo telefone 475-323-2056 ou em [vricks@westcog.org](mailto:vricks@westcog.org).



## **TITLE VI COMPLAINT FORM**

### **ENGLISH: TITLE VI & RELATED PROGRAMS: DISCRIMINATION 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
- National Origin
- Age
- Disability
- Sex

**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 filed 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: Victoria Ricks, Title VI Coordinator, Western CT Council of Governments, 1 Riverside Road, Sandy Hook, CT 06482, [vricks@westcog.org](mailto:vricks@westcog.org), telephone/fax 475-323-2056.**

## **ESPAÑOL: FORMULARIO DE QUEJA POR DISCRIMINACIÓN DE TÍTULO VI Y PROGRAMAS RELACIONADOS**

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:**
- ☐ **Teléfono:**

**Fue discriminado a causa de:**

- ☐ Raza
- ☐ Color
- ☐ Origen Nacional
- ☐ Edad
- ☐ Discapacidad
- ☐ Sexo

**Fechas(s) del Incidente:**

Por favor, proporcione la ubicación donde ocurrió la supuesta discriminación y el nombre de la persona o personas 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 de la agencia/corte donde usted sentó el reclamo:**

- ☐ Nombre:
- ☐ Dirección:
- ☐ Ciudad, Estado:
- ☐ Teléfono:

**Por favor firme y coloque la fecha a continuación. Puede adjuntar cualquier material escrito o cualquier otra información como usted crea relevante para su reclamo.**

- ☐ Firma:
- ☐ Fecha:

**Presente este reclamo a: Victoria Ricks, Title VI Coordinator, Western CT Council of Governments, 1 Riverside Road, Sandy Hook, CT 06482, [vricks@westcog.org](mailto:vricks@westcog.org), telephone/fax 475-323-2056.**

## **PORTUGUÊS: FORMULÁRIO DE QUEIXAS PARA A DISCRIMINAÇÃO DO TÍTULO VI E PROGRAMAS RELACIONADOS**

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:**
- **Telefone:**

**Você foi discriminado/a por:**

- Raça
- Cor
- Nacionalidade
- Idade
- Deficiência
- Sexo

**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 registrou essa queixa em alguma outra agência federal, estadual ou local ou com algum tribunal federal ou estadual?**

- Sim
- Não

**Observe que as reclamações também podem ser arquivadas no 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. Marque todos que se aplicam.**

- Agência Federal
- Tribunal Federal
- Agência Estadual
- Tribunal Estadual
- Agência Local

**Por favor, preencha as informações da pessoa de contato do órgão/tribunal onde a reclamação foi realizada.**

- Nome:
- Endereço:
- Cidade, Estado:
- 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: Victoria Ricks, Title VI Coordinator, Western CT Council of Governments, 1 Riverside Road, Sandy Hook, CT 06482, [vricks@westcog.org](mailto:vricks@westcog.org), telephone/fax 475-323-2056.**

## **TITLE VI NOTICE TO THE PUBLIC**

## ENGLISH:

### **Your Rights Under Title VI of the Civil Rights Act of 1964**

WestCOG, SWRMPO and HVMPO will effectuate the provisions of Title VI of the Civil Rights Act of 1964, as amended (42 USC §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.

Any person who believes that he or she has been subjected to discrimination prohibited under Title VI may file a complaint with the Title VI Coordinator of both the HVMPO and SWRMPO. 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: Victoria Ricks, Western CT Council of Governments, 1 Riverside Road, Sandy Hook, CT 06482. Email: [vricks@westcog.org](mailto:vricks@westcog.org) Telephone/Fax: 475-323-2056. Complaints may also be filed with the Connecticut Department of Transportation or Federal Highway Administration.

Connecticut Department of  
Transportation

Attn: Title VI Coordinator

2800 Berlin Turnpike

Newington, CT 06131

Federal Highway Administration

FHWA Civil Rights Office

1200 New Jersey Avenue, SE

8<sup>th</sup> Floor, E81-105

Washington, DC 20590

For language assistance or other accommodations, contact Western Connecticut Council of Governments at [help@westcog.org](mailto:help@westcog.org).

Para asistencia con el idioma y otras adaptaciones, por favor póngase en contacto con WestCOG al [help@westcog.org](mailto:help@westcog.org).

Para obter assistência língua ou outras acomodações, entre em contato com WestCOG em [help@westcog.org](mailto:help@westcog.org).

**Complaint Forms can be found on the WestCOG website:** <https://westcog.org/reports-audits/public-participation-titlevi/>

**Title VI is the Law**



## ESPAÑOL:

### Sus derechos según el Título VI de la Ley de Derechos Civiles de 1964

WestCOG, SWRMPO y HVMPO aplicarán las disposiciones del Título VI de la Ley de Derechos Civiles de 1964, según enmendada (42 USC §2000d), 49 CFR Parte 21 y 23 CFR Parte 200, FTA circular 4702.1.B y otras directivas contra la discriminación. WestCOG, SWRMPO y HVMPO prohíben la discriminación por motivos de raza, color o origen nacional y se asegurarán de que ninguna persona sea excluida de la participación, se le nieguen los beneficios o se vea sometida a discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal del Departamento de Transporte del Estado de los Estados Unidos.

Cualquier persona que crea que ha sido objeto de discriminación prohibida por el Título VI puede presentar una queja ante el Coordinador del Título VI de SWRMPO y HVMPO. Para obtener más información sobre cómo preparar una queja, recibir una copia del formulario de queja o presentar una queja, comuníquese con el Coordinador del Título VI: Victoria Ricks, Western CT Council of Governments, 1 Riverside Road, Sandy Hook, CT 06482. Correo electrónico: [vricks@westcog.org](mailto:vricks@westcog.org) Teléfono /Fax: 475-323-2056. Las quejas también pueden presentarse ante el Connecticut Department of Transportation o la Federal Highway Administration.

Connecticut Department of  
Transportation

Attn: Title VI Coordinator

2800 Berlin Turnpike

Newington, CT 06131

Federal Highway Administration

FHWA Civil Rights Office

1200 New Jersey Avenue, SE

8<sup>th</sup> Floor, E81-105

Washington, DC 20590

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Para obter assistência língua ou outras acomodações, entre em contato com WestCOG em [help@westcog.org](mailto:help@westcog.org).

Los formularios de queja se encuentran en el sitio web de WestCOG: <https://westcog.org/reports-audits/public-participation-titlevi/>

**Título VI es la ley**



## PORTUGUÊS:

### Os direitos sob o título VI da lei dos Direitos Civis de 1964

WestCOG, SWRMPO e HVMPO efetuarão as provisões do Título VI da Lei de Direitos Civis de 1964, emendada (42 USC §2000d), 49 CFR Part 21, e 23 CFR Part 200, FTA circular 4702.1.B e outras diretrizes contra a discriminação. WestCOG, SWRMPO e HVMPO proíbem a discriminação com base em raça, cor ou nacionalidade e garantirão que nenhuma pessoa seja excluída da participação, negada ou sujeita a discriminação sob qualquer programa ou atividade que receba assistência financeira federal. do Departamento de Transportes dos Estados Unidos.

Qualquer pessoa que acredite ter sido sujeita a discriminação proibida pelo Título VI pode apresentar uma queixa ao Coordenador do Título VI da SWRMPO e da HVMPO. Para obter mais informações sobre como preparar uma reclamação, para receber uma cópia do formulário de reclamação ou para registrar uma reclamação, entre em contato com o coordenador do Título VI: Victoria Ricks, Western CT Council of Governments, 1 Riverside Road, Sandy Hook, CT 06482. Email: [vricks@westcog.org](mailto:vricks@westcog.org) Telefone /Fax: 475-323-2056. Reclamações também podem ser arquivadas no Connecticut Department of Transportation ou na Federal Highway Administration.

Connecticut Department of  
Transportation

Attn: Title VI Coordinator

2800 Berlin Turnpike

Newington, CT 06131

Federal Highway Administration

FHWA Civil Rights Office

1200 New Jersey Avenue, SE

8<sup>th</sup> Floor, E81-105

Washington, DC 20590

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Para obter assistência língua ou outras acomodações, entre em contato com WestCOG em [help@westcog.org](mailto:help@westcog.org).

**Formulários de reclamação se encontram no site do WestCOG:** <https://westcog.org/reports-audits/public-participation-titlevi/>

**Título VI é a lei**

