

**CONNECTICUT DEPARTMENT OF TRANSPORTATION (CTDOT)
OFFICE OF CONTRACT COMPLIANCE (OCC)**

2800 Berlin Turnpike - Newington, CT 06111

**Metropolitan Planning Organization (MPO)
Title VI Compliance Update Form**

To ensure that CTDOT, as a recipient of US DOT funding, is in compliance with the Title VI Program and to ensure that any subrecipients, whereby CTDOT passes through federal funding, are also in compliance, the CTDOT requires that MPOs respond to the questionnaire.

Your Title VI program can be submitted via hard copy or electronically. If submitted electronically please email to Ms. Irma Reyes at Irma.reyes@ct.gov.

Please review the questions below and respond "Yes" or "No". If your response is "No" to any of the questions, please indicate the date that you will submit your response to CTDOT. Your submission date should not exceed **March 12, 2014**.

MPO- General Requirements <i>(Please indicate if you have the following):</i>	Yes/No	If No, please indicate the completion and submission date:	Comments
1. Title VI Notice to the Public, including a list of locations where the notice is posted.	Yes		Notice is posted at CCRPA's offices, CCRPA's website, and on paratransit vehicles.
2. Title VI Complaint Procedures.	Yes		Last updated 2012.
3. Title VI Complaint Form.	Yes		Last updated 2012.
4. List of Transit-related Title VI investigations, complaints and lawsuits.	Yes		CCRPA, and the paratransit provider (Dattco), have not received any Title VI complaints. In the past five years, CTtransit New Britain has received two Title VI complaints. Both were investigated by staff at CTtransit and the Title VI Coordinator at CTDOT and were dismissed as being without merit. No lawsuits were filed.
5. Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts.	Yes		See attached Public Participation Plan (PPP). Also available online at CCRPA's website under "Get

6. Language Assistance Plan for providing language assistance to persons with LEP.
7. A table depicting the membership of non-elected committees and councils, broken down by race, and a description the agency uses to encourage participation of minorities in such committees.
8. If you are a "primary recipient," include a description of how the agency monitors its subrecipients for compliance with Title VI.
9. A Title VI equity analysis if you are a recipient that has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
10. A copy of board meeting minutes, resolution or other appropriate documentation showing the board of directors or appropriate governing entity or officials responsible for policy decisions reviewed and approved the Title VI Program.

		Involved."
Yes		The Language Assistance Plan is documented within the Title VI Program. (See attached.)
Yes.		See attached table of committee membership by race. CCRPA encourages participation from all members of the public, regardless of race. See CCRPA website under "Get Involved" and attached PPP.
N/A	N/A	N/A
N/A	N/A	N/A
No	March 18 th , 2014.	To be re-affirmed at the upcoming Agency Board Meeting on March 18 th , 2014.

Transit Provider - *IF MPO is a Fixed Route Transit Provider or that operates 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population.
1. Service Standards?
a. Vehicle Load
b. Vehicle Headway
c. On Time Performance
d. Service Availability
2. Service Policies?
a. Transit Amenities
b. Vehicle Assignment
3. Collect and report demographic and service profile maps and charts. Survey data regarding customer demographic and

Yes/No	If No, please indicate the completion and submission date:	Comments
N/A	N/A	N/A

travel patterns.

MPO- Additional requirements
4. Does the MPO have a demographic profile of the Metropolitan Area?
5. Does the MPO contain a description of procedures by which the mobility needs of minority populations are identified and considered within the planning process?
6. Does the MPO have demographic maps that show the impacts of the distribution of State and Federal funds in the aggregate for public transportation projects?
7. Does the MPO have an analysis of their transportation system investments that identifies and addresses any disparate impacts?
8. Does the MPO describe the procedures the agency uses to ensure nondiscriminatory pass-through of FTA financial assistance (if requested)?
9. Does the MPO describe the procedures the agency uses to provide assistance to potential subrecipients in a nondiscriminatory manner (if requested)?

Yes/No	If No, please indicate the completion and submission date:	Comments
Yes		Demographic profile of the region is part of the Long Range Transportation Plan (LRTP). The LRTP can be viewed online at CCRPA's website. (Too large to attach to e-mail.)
Yes		CCRPA's Unified Planning Work Program (UPWP) describes the procedures of the PPP which engages all members of the public regardless of work. This can be found in Section 5 "Public Participation" of the UPWP which is available at CCRPA's website. (Too large to attach to e-mail.)
Yes		Demographic and funding maps are part of the Title VI Program. (See attached.)
Yes		The Title VI Program includes an analysis. (See attached.)
N/A	N/A	N/A
N/A	N/A	N/A



for the central Connecticut region
fiscal years 2012 to 2016

prepared by Francis R. Pickering
Senior Planner | May 5, 2011

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Preface

This document, the Public Participation Plan (PPP) of the Central Connecticut Regional Planning Agency (CCRPA, or ‘the Agency’), serves two purposes:

1. It serves as a guide for Agency staff on where, when, and how to involve the public in the Agency’s Metropolitan Planning Organization (MPO) activities.
2. It informs the public of opportunities to provide input in these activities.

As the PPP should clarify, CCRPA espouses a public involvement process that provides complete and timely information, public notice, and solicits input from the communities affected by its MPO activities. These activities include, but are not limited to, the Long-Range Transportation Plan (LRTP); the Unified Planning Work Program (UPWP), the Transportation Improvement Program (TIP); this Public Participation Plan (PPP); and special projects such as those described under the Project Schedule in Task 3, *Planning activities*, of the UPWP.

As part of its MPO planning and programming process, CCRPA shall involve as broad and representative a cross-section of the population and the region as practical. Depending on the project in question, these stakeholders may include:

1. Residents, workers, and visitors in the region
2. User groups (including pedestrians, cyclists, and transit riders)
3. Transit providers and operators
4. Transportation providers and operators (e.g. truck and rail freight)
5. Local, state, and federal agencies
6. Environmental groups
7. Other non-governmental organizations and interested parties

In all cases, the Agency shall strive to involve stakeholders with an interest in proposed changes to the regional transportation system, in addition to those engaged through the general planning process.

SECTION 5307 GRANT RECIPIENTS

The public involvement plan as described herein and as adopted by the CCRPA for its TIP shall also serve to satisfy all of the public involvement requirements, including provision for public notice, review, and comment, of The New Britain Transportation Company and DATTCO as applicants for regular Section 5307 (FTA Transit Capital) funds.

REVISION HISTORY

Major Revisions: 6/05

Minor Revisions: 6/06

Major Revisions: 11/06, adopted 2/07

Reorganization: 2/11, adopted 5/11

ACCESS TO RESOURCES

PERSONNEL

CCRPA staff shall be available to the public during regular business hours in its offices. Members of the public may contact staff by e-mail, telephone, fax, or postal mail; for in-person assistance, appointments are highly recommended.

The Agency's offices are at 225 North Main Street, Suite 304, Bristol, CT 06010-4993; CCRPA's telephone and fax number is 860-589-7820.

WEB SITE

CCRPA shall maintain a web site. The website shall include the following as a minimum:

1. A calendar of Agency meetings
2. Agendas, supporting documents, and minutes for all official Agency meetings
3. Public notices which the Agency has issued
4. Public reports and plans that the Agency has produced, including public drafts and final versions of the documents listed under *Major planning products*, p. 8
5. Directions to the office and staff contact information

The Agency's web site can be accessed at <http://ccrpa.org>.

DOCUMENTS

CCRPA shall comply with all applicable federal and state "Freedom of Information Laws," including Chapter 14 of the Connecticut General Statutes, as amended. CCRPA shall furnish physical and/or electronic copies of its documents to any interested party. Copies shall be made available via e-mail and fax as well as in printed and media form.

In addition to relevant State and federal statutes, the operations of CCRPA, including its Board, Committees, and staff, are governed various bylaws, policies, and agreements. Together with agendas, minutes, referrals, resolutions, grant applications, contracts,

budgets, and audit reports, among others. These documents constitute CCRPA’s ‘official records.’ The Agency shall maintain these records and provide them for public inspection at its offices during its working hours. CCRPA shall maintain internal audit, reporting, and record-keeping systems to document and substantiate compliance with standards, and will submit such documentation to the Connecticut Department of Transportation’s (ConnDOT) Office of Contract Compliance, or other appropriate party on request.

MEETINGS AND HEARINGS

Regular and special meetings

The CCRPA Board and Committees shall hold regular meetings and, on occasion, hold special meetings. All meetings with the exception of executive sessions shall be open to the public. Unless otherwise specified, regular meetings shall take place in the Agency’s offices. The location of special meetings shall be specified in the meeting notice.

Notices and documents for regular and special CCRPA Board and Committee meetings shall be distributed as follows:

Whom to send	What	How¹
Municipal clerks ²	Notice and agenda	E-mail/mail
Board/Committee members	Notice, agenda, minutes ³ , supporting documents ⁴	E-mail/mail, web site
Public	Notice, agenda, minutes ³ , supporting documents ⁴	Web site
Interested parties (by request)	Depends on request	E-mail/fax/mail

¹ Slashes indicate ‘or.’ Means of communication are listed in descending order of preference (i.e., documents will be faxed when e-mail is infeasible; when both are impossible, postal mail will be used).

² Of municipalities in the region.

³ Where applicable.

⁴ Where applicable and practical.

Notices and documents shall be distributed a minimum of five (5) Agency working days before a regular meeting and three (3) Agency working days before a special meeting. In addition, a yearly schedule of all regular meetings shall be filed with the Secretary of State, all municipal clerks in the region, and posted on the Agency’s web site by January 31 of every year.

Public hearings and meetings

One or more public hearings or informational meetings as well as a review period shall precede the enactment of substantial changes to major documents. These documents are listed below, together with the respective minimum review period and number of public hearings and/or informational meetings to be observed.

Document	Public hearings and meetings	Review period
Long-Range Transportation Plan (LRTP)	One meeting <i>and</i> one public hearing	30 days
Transportation Improvement Program (TIP)	One public hearing	30 days
Public Participation Plan (PPP)	One public hearing	45 days
Unified Planning Work Program (UPWP)	None	30 days
Special projects (e.g. those in Task 3 of the UPWP)	Optional	Optional

Due to the frequency of updates to these documents, in particular to the TIP, and the ample opportunities already afforded for public review and participation (meetings are public, with materials posted in advance online), neither a public meeting/informational hearing nor a review period shall be necessary for minor/routine changes to these documents. However, major TIP or LRTP amendments necessitating a new air quality conformity analysis as a result of projects originating or occurring in the region shall be treated as a new substantial change and treated as indicated in the table above.

The following notification schedule shall be observed when setting up public hearings and informational meetings for the Agency Board/Committees:

Whom to notify	When	How
Municipal clerks	At least 30 ⁵ days prior to the end of the public review period	Send public notice/agenda and make available a copy of all public documents
Hartford Courant and/or other media outlets	In time to ensure publication at least 30 ⁵ days prior to the end of the public review period	Legal notice for publication
Adjacent Regional Planning Organizations ⁶	At least 30 ⁵ days prior to the end of the public review period	Send public notice/agenda and make available a copy of all public documents
Agency members and agency website	At least 30 ⁵ days prior to the end of the public review period	Send public notice/agenda and make available a copy of all public documents

Legal notices, summarizing opportunities for commenting on the proposed changes, will include date, time, place, subject, and filing of notice with municipal clerks and will note that relevant documents can be reviewed online, at the Agency’s offices, and at the municipal clerks’. Legal notices for the LRTP shall appear in English and Spanish.

Notices to municipal clerks and the aforementioned Regional Planning Organizations will include date, time, place, subject, agenda, and links to or electronic copies of the relevant documents. Notices to clerks will also include paper copies of the documents and a request to post and keep the relevant documents on file until the date of hearing or end of comment period, whichever is later.

On the public hearing and informational meeting dates, signage to the meeting location will be posted on doors, stairs/elevators, and hallways as necessary.

Comments and input

All meeting agendas shall include an item and include time for ‘Public Comments’ for testimony from the public. Comments may be given live at a meeting; however, the

⁵ 45 days in case of the Public Participation Plan.

⁶ These are currently the Capitol Region Council of Governments, the Midstate Regional Planning Agency, the Council of Governments of the Central Naugatuck Valley, and the Litchfield Hills Council of Elected Officials.

meeting or hearing chair shall have the right to set a time limit for spoken testimony. Should a member of the public wish to add an item to a meeting agenda, Agency staff shall do so, provided a formal request to that effect is received at least five (5) days in advance of a scheduled meeting.

Testimony may be submitted in written or recorded form prior to the end of discussion of the pertinent agenda item (for regular or special meetings and public hearings) or, where applicable, after the beginning but before the end of the review period.

Comments and testimony submitted shall become part of the public record.

The Agency shall respond to public comments received on a project with a mandatory review period within fifteen (15) Agency working days. Staff shall provide commenters with notices of forthcoming meetings or hearings associated with the project. Upon completion of the project, CCRPA shall give a summary of its response to significant public comments during the development of such projects.

If the final form of a project differs significantly from the one that was made available for public comment and/or raises new material issues that interested parties could not reasonably have anticipated, CCRPA shall make available an added review period of at least thirty (30) days. This comment period will be advertised in the same manner as the original review period. Those who made comments with contact information shall be notified of the additional period.

MAJOR PLANNING PRODUCTS

CCRPA shall produce the following planning documents as part of its MPO functions. The Agency welcomes public involvement at all times. As part of the development of these documents, Agency staff seeks input from stakeholders and interested parties. This commentary informs the Agency's analyses and draft and final plans/programs.

Development, adoption, and modification of the following documents shall adhere to the process described under *Meetings and hearings*, p. 5. The public may comment on any of these documents by any of the means described under *Personnel*, p. 4, and/or at the public hearing(s) or informational meeting(s) held as part of the planning process.

Long Range Transportation Plan (LRTP)

The LRTP lays out a vision for the future of the region and its transportation system over at least the next twenty-five years and includes mid- and long-term projects. The Plan is produced every four years. The LRTP is developed in the following steps:

1. Data collection, including public input/informational meetings
2. Analysis and plan drafting
3. Review of draft Plan by Transportation Improvement Committee (TIC)
4. Public review period, including public hearing(s)
5. Ratification of the Plan by the MPO Board

Transportation Improvement Program (TIP)

The TIP lists all federally-funded surface transportation projects scheduled to occur in the region over a three to five year period. (Inclusion of a transportation project by the MPO into the TIP is a prerequisite for federal funding.) The TIP is produced every other year but is reprogrammed annually (typically in late spring, with final approval in June) and may be amended during the year. The Program is developed in the following steps:

1. Project collection
 - a. Solicitation of projects from regional stakeholders
 - b. Development of projects by staff
 - c. Receipt of State projects
2. Project evaluation and creation of priority list by staff
3. Development of draft Program based on staff-generated priority list
4. Review and revision of draft Program by TIC
5. Public review period, including public hearing(s)
6. Ratification of the Program by the MPO Board

Unified Planning Work Program (UPWP)

The UPWP outlines the transportation planning work the Agency expects to undertake over a two-year period. The Program is developed every other year. *Task 5* of the UPWP (p. 14) lists public involvement efforts for all MPO activities. The Program is developed in consultation with the Agency's TIC and Board.

Annual Listing of Projects

The Annual Listing of Projects takes stock of investments in transportation facilities for which federal funds have been obligated in the preceding year. To comply with Section 13A-153F of the Connecticut General Statutes, which mandates that at least one percent of funds received by the State and any municipality be spent on pedestrian and cyclist facilities, the Listing shall break out pedestrian- and cyclist-related expenditures on a town basis. The Listing is developed by ConnDOT but may be augmented by CCRPA.

FUNDING PROGRAMS

Transportation is funded through a variety of programs. Those in which CCRPA has a decisive role are described below. *This section, which only serves informational purposes, may be revised to reflect changes in State and federal laws, regulations, and policies.*

SURFACE TRANSPORTATION PROGRAM-URBAN (STPU)

STPU funds are the portion of the federal Surface Transportation Program (STP) funds allocated to MPOs. CCRPA selects STPU from submissions from member towns and other sources. Submissions include project plans, cost estimates, and other information. CCRPA solicits and selects projects approximately every two years (generally as part of development of the TIP). The criteria with which CCRPA reviews, evaluates, and recommends projects for selection can be found in the Agency document *Project Evaluation Criteria*.

Selected projects are incorporated into a priority list. Public input and decisions by the Agency's TIC and/or Board may affect the final priority list.

TRANSPORTATION ENHANCEMENT PROGRAM (TEP)

The TEP is funded by the federal STP program. States must spend ten percent of their STP funds on TEP projects. TEP projects serve to enhance the transportation system. There are twelve eligible TEP activities⁷:

1. pedestrian and bicycle facilities

⁷http://www.enhancements.org/12_Activities.htm. Accessed 4/18/04.

2. pedestrian and bicycle safety and educational activities
3. acquisition of scenic or historic easements and sites
4. scenic or historic highway programs including tourist and welcome centers
5. landscaping and scenic beautification
6. historic preservation
7. rehabilitation and operation of historic transportation buildings, structures or facilities
8. conversion of abandoned railway corridors to trails
9. control and removal of outdoor advertising
10. archeological planning and research
11. environmental mitigation of runoff pollution and provision of wildlife connectivity, and
12. establishment of transportation museums.

Every five to six years, CCRPA selects TEP from submissions from member towns and other sources. Submissions include project plans, cost estimates, and other information. The criteria with which CCRPA reviews, evaluates, and recommends projects for selection can be found in the Agency document *Project Evaluation Criteria*.

Selected projects are incorporated into a priority list. Public input and decisions by the Agency's TIC and/or Board may affect the final priority list. Unlike STPU, final authority rests with ConnDOT, which makes selections from the priority lists of MPOs.

CONGESTION MITIGATION AND AIR QUALITY IMPROVEMENT (CMAQ)

Information to be supplied.

TRANSIT ENHANCEMENTS

Information to be supplied.

APPENDIXES

About CCRPA

The Central Connecticut Regional Planning Agency (CCRPA) prepared this document.⁸ As the federally-designated Metropolitan Planning Organization for central Connecticut, the Agency plays a key role in planning and the distribution of funds for transportation in the region.

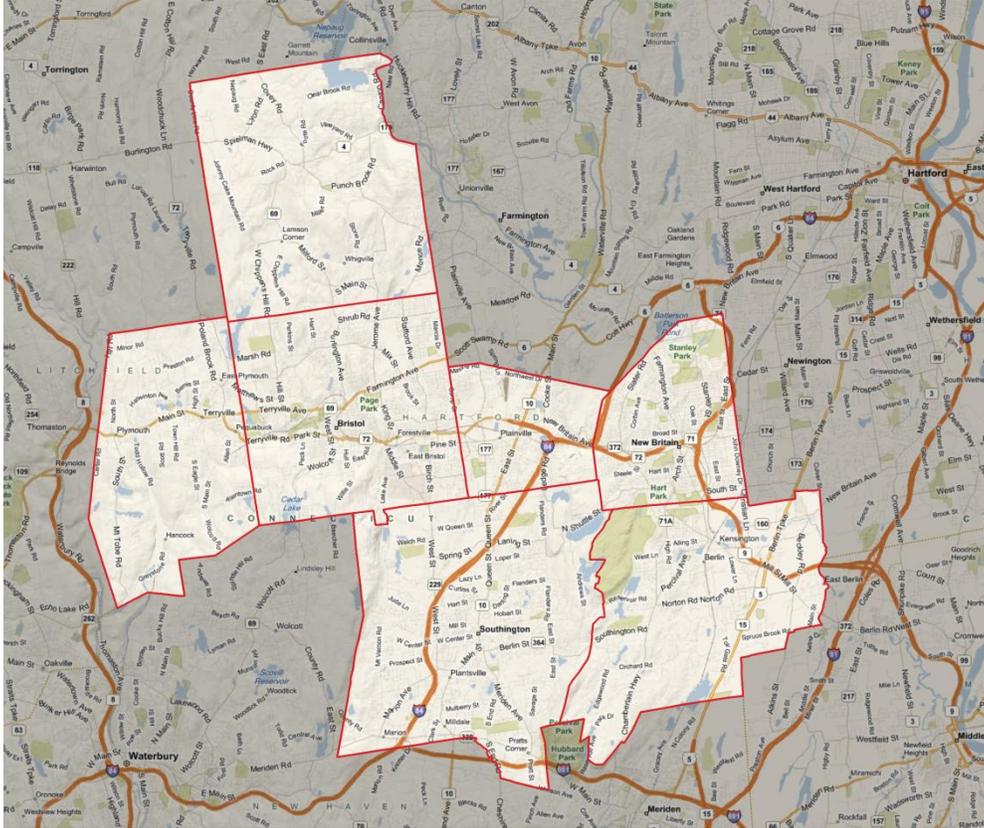
CCRPA arose through the provisions of Chapter 127 of the Connecticut General Statutes, enacted in 1955, which authorized the delineation of regional planning areas and the creation of regional planning agencies in those areas upon vote of the municipalities contained therein. The Agency is governed by a Board of members selected by member municipalities.⁹ Agency members comprise the cities of Bristol and New Britain as well as the towns of Berlin, Burlington, Plainville, Plymouth, and Southington. The Agency's Board first convened on March 17, 1966.

In 1974, CCRPA initiated a transportation planning program under grants from FHWA and the ConnDOT. The transportation planning process is conducted in accordance with a Memorandum of Understanding between CCRPA and ConnDOT. A map showing the boundaries of the central Connecticut region, its notable transportation facilities, and its major natural features is below.

⁸ The UPWP is a response to federal regulations. See 23 CFR Part 450.308 for details.

⁹ Representatives are selected in accordance with Chapter 127, Section 8-31 of the Connecticut General Statutes. The Planning and Zoning Commission of each municipality elects one representative; the chief elected official of each municipality appoints one, and, depending on population, the town council may elect another one. As of 2010, the Board has a total of seventeen members; three members each from Bristol, New Britain, and Southington and two members each from Berlin, Burlington, Plainville, and Plymouth. A list of board members is posted on the Agency's web site.

REGIONAL MAP



Special concerns

TITLE VI AND ENVIRONMENTAL JUSTICE

CCRPA respects the 1994 Executive Order on Environmental Justice (EO 12898), Title VI of the 1964 Civil Rights Act, and related guidance from the State of Connecticut, the Federal Highway Administration, and the Federal Transit Administration. To this end, in addition to following the notification, publication, and public involvement procedures set forth under *Meetings and hearings* (p. 5), public notices for meetings of the CCRPA and its subcommittees of potential interest to low income or minority persons shall be provided to stakeholders relevant to these persons. These include but are not limited to transit groups, social services providers, nonprofit and community-based organizations, civic clubs, neighborhood groups, revitalization zones, homeowner associations, and media outlets serving low income and minority persons.

In addition, CCRPA shall make reasonable efforts to identify groups with a stake in a given activity or project, establish contact with these groups, and seek to engage them in relevant, meaningful, and satisfactory ways.

LIMITED ENGLISH PROFICIENCY

CCRPA devotes special consideration to the needs of individuals with limited English proficiency. Staff shall ensure the availability of document translation into and meeting interpretation for community languages other than English (namely Spanish and Polish). When warranted, staff shall conduct outreach and public participation in languages other than English. CCRPA efforts shall be consistent with the signed Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” dated August 11, 2000.

ADMINISTRATIVE RECOURSE

Should a formal complaint about the Agency’s adherence to or performance under any part of this document, including the Title VI and Limited English Proficiency be lodged, it shall be handled according to the Agency’s *MPO Appeals Policy*.

UPWP Task 5 (Public Participation)

OBJECTIVE

Community involvement and observance of civil rights laws and regulations are part and parcel of CCRPA’s activities. CCRPA continues to seek ways to improve its public participation process and will further implement its Public Participation Plan with environmental justice¹⁰ and Title VI outreach elements as well as review procedures in light of recommendations from the MPO recertification review (2010). Procedures have been developed to incorporate the Public Involvement Plan with the overall planning process, with an evaluative component.

CCRPA will continue to seek to involve the public, particularly groups that may be underserved by the transportation planning process, such as minorities, women, the el-

¹⁰ The U.S. DOT defines environmental justice as comprising the following three precepts: 1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations. 2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process. 3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

derly, and the disabled. Activities related to these groups will include soliciting input and inviting participation from such groups in all public stages of the transportation planning process as well as operating the workplace in accordance with Federal and State Affirmative Action and Equal Opportunity Regulations. A continuation of environmental justice components within consideration of the project selection process for STP-Urban funding, and consideration of procedures for incorporation of environmental justice details within the planning process will be an annual task. Procedures for improving outreach to all groups throughout the planning process will be reviewed, modified and implemented with particular attention to these groups. The process of public participation and outreach is regularly reviewed and evaluated for identifying areas needing improvement.

ACTIVITIES

CCRPA will:

1. Evaluate the public involvement process regularly and incorporate new methods into Agency operations and the Public Participation Plan.
2. Expand outreach strategies, including initiatives with community groups.
3. Report on potential and actual project impacts with Social Impact Reports.
4. Examine the distributions of benefits and burdens of transportation investments outlined in the Long-Range Transportation Plan and TIP as it impacts Title VI and/or environmental justice clusters.
5. Provide notice of foreign language assistance upon request on all meeting agendas and for all major products.
6. Document all public involvement activities for the TIP, (E)STIP, Long-Range Transportation Plan, and all planning activities containing public participation components.

PRODUCT SCHEDULE

In addition to the items listed under Task 1:

Item	Release date
Articles and press releases for community and media sources	Ongoing
Outreach to stakeholder groups through various means and media	Project basis
Translated documents upon request	On demand

Public review for the PPP

CCRPA is committed to the continual improvement of all its processes and products. This includes the PPP. The Agency has not received any comments or complaints regarding its public involvement efforts or procedures since ratification of the last update to the Plan or during the preparation and review period for this Plan. Public involvement efforts undertaken by CCRPA as part of this Plan are described in the report entitled *Documentation of public involvement in the LRTP and PPP*.



for the Central Connecticut Regional Planning Agency

Adopted DATE
Last amended DATE

Central Connecticut Regional Planning Agency
225 N Main Street, Suite 304, Bristol, CT 06010
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INTRODUCTION

The Central Connecticut Regional Planning Agency (CCRPA) is the federally-designated Metropolitan Planning Organization (MPO) for the Central Connecticut Region. CCRPA is guided by federal Title VI, Environmental Justice (EJ), and Limited English Proficiency (LEP) laws, regulations, and guidance to ensure that:

- The planning process does not exclude any segment of the population, particularly minority, disabled, elderly, and low-income populations.
- Transportation investments do not disproportionately benefit or burden a population group.

Review of Title VI, EJ, and LEP

Title VI of the 1964 Civil Rights Act prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.¹ A Title VI violation occurs when federally-funded projects disproportionately benefit or negatively affect any specific group of people.

A 1994 Presidential Executive Order on Environmental Justice (EJ) directs every federal agency to identify and address the effects of all programs, policies, and activities on minority and low-income populations. Effective transportation planning depends on understanding and addressing the needs of all socioeconomic groups.²

A 2000 Presidential Executive Order on Limited English Proficiency (LEP) directs every federal agency to provide meaningful access for large non-English speaking populations to services and programs that receive federal funding.³

The latest federal guidance (October 2012) is FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. This document may be found online at: http://www.fta.dot.gov/legislation_law/12349_14792.html.

¹ U.S. Department of Justice Title VI Website. <http://www.usdoj.gov/crt/cor/coord/titlevi.htm>. Accessed 2013.

² U.S. Department of Transportation Environmental Justice Website. <http://www.fhwa.dot.gov/environment/ej2000.htm>. Accessed 2012.

³ Limited English Proficiency Interagency Website. <http://www.lep.gov/13166/eo13166.html>. Accessed 2012.

Relation to transportation plans and projects

CCRPA seeks to incorporate Title VI, EJ, and LEP considerations into all of its activities, including documents such as the region's Long Range Transportation Plan (LRTP), its Transportation Improvement Program (TIP), and any special plans and studies that CCRPA undertakes.

The LRTP lays out a vision for the development of the region's transportation system over a longer span, typically 30-years. The LRTP contains demographic and socioeconomic analysis of the region.

The TIP lists all transportation projects in the region that are scheduled to receive federal funding over a four year period. Projects in the TIP as of publication have been plotted on a map of the region to analyze the impacts to population segments. (See *Maps & Impact Analysis*, p. 9.)

Relation to the MPO process

Title VI, EJ, and LEP concerns guide CCRPA's planning and public participation processes. The Public Participation Plan (PPP) describes how CCRPA works to inform and involve all segments of the population. The PPP specifically addresses Title VI, EJ, and LEP concerns. Unified Planning Work Program (UPWP), which is CCRPA's plan of work, includes projects designed to serve and involve minority, disabled, elderly, and low-income populations and results in quarterly reporting on Title VI, EJ, and LEP-related activities.

In response to a request by the Connecticut Department of Transportation, CCRPA collects data on the racial/ethnic composition of its committees and boards.

Policy statement and endorsement

CCRPA is committed to ensuring that no person is excluded from participation, denied benefits, or otherwise subjected to discrimination under any program or activity, on the basis of race, color, national origin, or any other basis as described by applicable laws, regulations, and guidance on Title VI, EJ, and LEP.

CCRPA as a recipient and subrecipient of federal financial assistance will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended and related statutes and regulations (such as EJ and LEP) in all programs and activities.

Any person who believes that he or she has been subjected to discrimination or retaliation in violation of Title VI, EJ, and LEP laws may file a formal complaint directly to CCRPA or the funding agency. Please see the “Complaint Process and Forms” section for more information.

CCRPA’s Board has adopted and endorsed this program. (See *Appendix A: endorsement*, p. 17, for a resolution to this effect.)

LANGUAGE ASSISTANCE PLAN

In accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, no person shall be subjected to discrimination on the basis of race, color, or national origin. Furthermore, *Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency*, states that differential treatment based upon a person’s inability to speak, read, write, or understand English is a type of national origin discrimination.

CCRPA is committed to giving residents with LEP meaningful access to its transportation planning and services. The analysis below identifies LEP populations in the region as of 2010 and documents how they will be provided with language services.

Four Factor Analysis

FACTOR 1. THE NUMBER AND PROPORTION OF LEP PERSONS SERVED OR ENCOUNTERED IN THE CCRPA MPO REGION.

The U.S. Department of Justice has recommended the following two criteria to identify LEP populations. For a non-English speaking group to qualify as LEP, they must either:

1. Constitute at least 5% of the total population,
2. Or number at least 1,000 persons

and not speak English very well. The 2010 American Community Census reports that 21,614 persons, or 9.8% of all residents in the region, speak a foreign language natively and do not speak English “very well.” The two largest non-English language groups are Spanish and Polish. 8,622 Spanish speakers (3.9% of the region’s population) report speaking English less than “very well.” 7,124 Polish speakers (3.2%) report the same. The following table shows the languages where more than 0.1% of the population speaks English less than “very well.”

CCRPA has identified Spanish and Polish as the primary languages requiring assistance.

Native language	Persons	Percent	Speaks English less than “very well”	
			Persons	Percent
English	167,629	76.1%	--	--
Spanish or Spanish Creole	22,743	10.3%	8,622	3.9%
Polish	13,128	6.0%	7,124	3.2%
French (incl. Patois, Cajun, Creole)	5,562	2.4%	1,393	0.6%
Italian	3,089	1.4%	1,186	0.5%
Portuguese or Portuguese Creole	594	0.3%	282	0.1%
Serbo-Croatian	640	0.3%	244	0.1%
Other Indo-European languages	669	0.3%	155	0.1%
Russian	386	0.2%	206	0.1%
Other Slavic languages	411	0.2%	213	0.1%
Chinese	440	0.2%	331	0.2%
Other Asian languages	419	0.2%	143	0.1%
Arabic	428	0.2%	237	0.1%

New Britain has the highest LEP population among the region’s municipalities. In the city, 9.4% and 8.4% of Spanish and Polish native speakers, respectively, speak English less than “very well”.

FACTOR 2. THE FREQUENCY WITH WHICH LEP INDIVIDUALS COME INTO CONTACT WITH MPO PROGRAMS, ACTIVITIES, AND SERVICES.

CCRPA staff has reviewed the frequency with which LEP persons have come in contact with services provided by the MPO. Over the past four years, two phone requests were made for a paratransit application to be translated into Spanish. There have been no other requests for interpreters at meetings or for the translation of documents. Contact from LEP persons is most likely to occur through phone calls, office visits, or public meetings.

FACTOR 3. THE NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY OR SERVICE PROVIDED BY THE MPO TO THE LEP POPULATION.

The CCRPA MPO uses federal funds to plan for future transportation improvements and projects. It is important for LEP persons to have equal ability to participate in the planning process of these projects, particularly in public meetings or comment periods.

FACTOR 4. THE RESOURCES AVAILABLE TO THE MPO AND OVERALL COSTS TO PROVIDE LEP ASSISTANCE.

In the event that a service is required beyond the assistance provided by staff, CCRPA will seek to provide language assistance. Agendas include notices in Spanish and Polish that interpreters are available on request. To date, no such service has been requested.

In the past, the two paratransit requests for a Spanish-translated document were directed to DATTCO, the Paratransit service provider. DATTCO has staff fluent in Spanish, and were successful in meeting the LEP needs.

Several documents on the CCRPA website are available for LEP persons, including the *Public Participation Plan*, which was translated into Spanish. The *Action Plan of the Long-Range Transportation Plan* and an informational brochure about CCRPA and MPOs were also translated into Polish and Spanish. Due to the cost of translation services and the few LEP requests made, CCRPA will translate documents on a requested basis.

More details on resources to LEP individuals are detailed in the *Assistance Plan* (below).

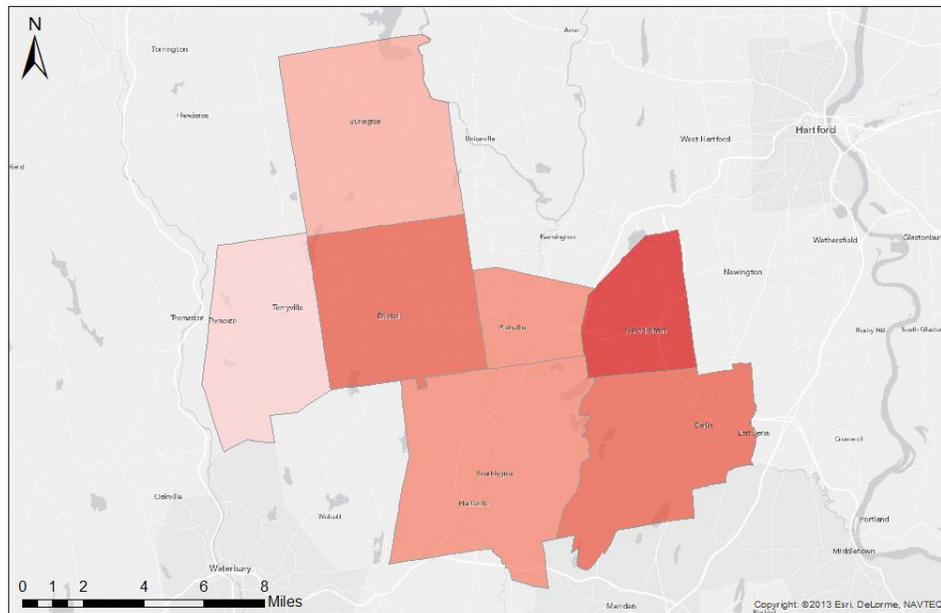
Assistance Plan

TASK 1. IDENTIFYING LEP INDIVIDUALS

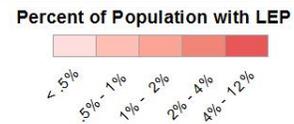
LEP persons have been identified according to the Four Factor Analysis. Based on the demographic data provided by the 2010 American Community Survey, roughly 10% of the region speaks English less than “very well.” The map below shows the geographic distribution of identified LEP persons. New Britain has the highest population of residents speaking English less than “very well.”

The following methods can be used to help identify an LEP individual that needs language assistance:

- “I Speak” cards are available in the office to help visiting LEP persons indicate which language they require assistance in.
- Requests made for assistance will be properly documented to help anticipate future needs.
- Interpreter and translator services will be provided, upon request, for all meetings.
- CCRPA will share relevant documents with local organizations serving any LEP persons in the region.



Percent of Town Population with Limited English Proficiency (LEP) within the Central Connecticut Region



TASK 2. LANGUAGE ASSISTANCE MEASURES

CCRPA will meet the needs of LEP persons in the region by offering the following:

- Should a request be made for interpreter or translator services, staff will take the contact information of the LEP person and make arrangements for language assistance.
- Notice of assistance is posted on all agendas in both Spanish and Polish.
- The *Public Participation Plan* is published online in Spanish.
- CCRPA will translate any published documents in another language upon request.

TASK 3. TRAINING STAFF

Training will be provided to staff members to inform them of Title VI procedures in the event that language assistance is requested. Training will include the following:

- Summary of the Title VI policy and CCRPA's responsibilities.
- Information on the types of services provided and how to access them.
- Training on documenting requests for language assistance.
- Instructions on handling a Title VI, EJ, or LEP complaint.

TASK 4. PROVIDING NOTICE TO LEP PERSONS

All public meeting agendas contain a notice, posted in Spanish and Polish, to contact the office if assistance is needed. Should a request arise for the assistance of an interpreter or translator, the MPO will seek to cover the cost of the service. Any notice will inform LEP individuals that language assistance is provided free of charge.

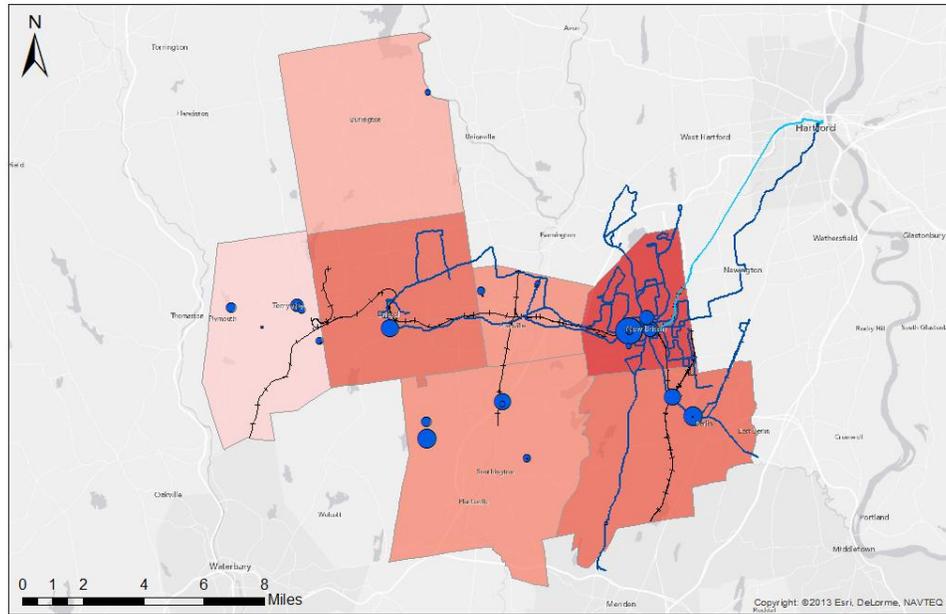
TASK 5. MONITORING AND UPDATING THE LEP PLAN

CCRPA will review the Language Assistance Plan on a regular basis and update it as is necessary. The identification of LEP populations will be updated as new demographic data are made available. CCRPA will also maintain information on assistance requested and provided to LEP persons through:

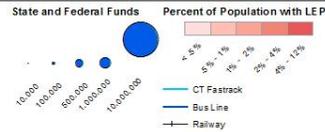
- Documentation of contact with LEP persons and requests for language assistance.
- Examination of how the LEP persons' requests were handled.
- Determination of any changes in the LEP populations in the region.
- Determination of the effectiveness of the current language assistance measures to meet the LEP population's needs.

MAPS & IMPACT ANALYSIS

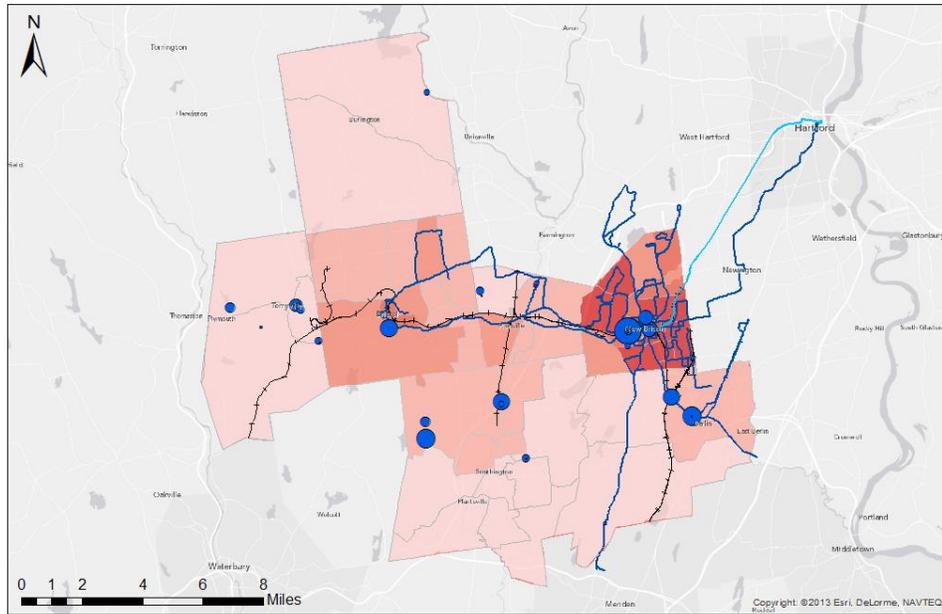
The *Long-Range Transportation Plan* features demographic and socioeconomic maps, e.g., income, age, disability, race, ethnicity, and vehicle availability, for the region. This section reviews the projects from the TIP in relation to population groups of special concern.



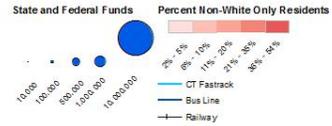
Transportation Project Locations and Percent of Town Population with Limited English Proficiency (LEP) within the Central Connecticut Region



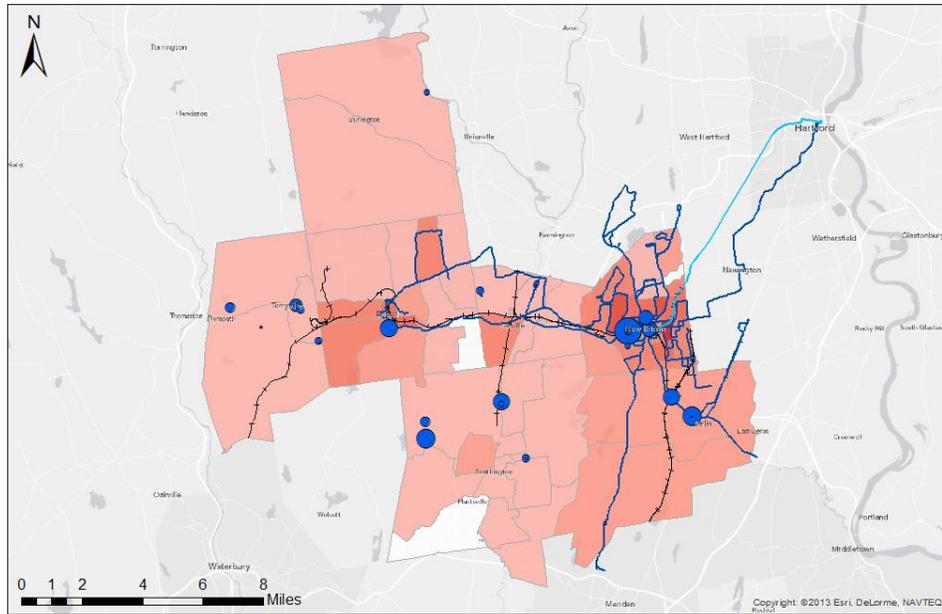
LEP Population	No. of Projects	Funding	Percent of Funding
< .5%	8	\$3,518,000	11.4%
.5% - 1%	1	\$300,000	1.0%
1% - 2%	10	\$7,506,000	24.3%
2% - 4%	5	\$7,651,000	24.8%
4% - 12%	8	\$11,924,000	38.6%
Total	32	\$30,899,000	100.0%



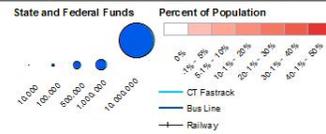
Transportation Project Locations and People of Color within the Central Connecticut Region



Non-White-Only Residents	No. of Projects	Funds	Percent of Funding
2% - 5%	14	\$4,981,000	16.1%
6% - 10%	9	\$11,562,000	37.4%
11% - 20%	1	\$2,432,000	7.9%
21% - 35%	5	\$7,020,000	22.7%
36% - 54%	3	\$4,904,000	15.9%
Total	32	\$30,899,000	100.0%



Transportation Project Locations and Residents Living Under the Poverty Line within the Central Connecticut Region



Population Below Poverty Line	No. of Projects	Funds	Percent of Funding
0%	0	\$0	0.0%
0.1% - 5%	19	\$11,324,000	36.7%
5.1% - 10%	5	\$7,651,000	24.8%
10.1% - 20%	7	\$10,324,000	33.4%
20.1% or more	1	\$1,600,000	5.2%
Total	32	\$30,899,000	100.0%

COMPLAINT PROCESS AND FORMS

CCRPA logs of all complaints. Separate processes to address for general complaints and Title VI/EJ/LEP complaints have been instituted. Complaint forms are available online at CCRPA's website; the form shown in *Appendix B: complaint form* (p. 18) is for reference.

This section lays out the process CCRPA follows to address Title VI/EJ/LEP complaints, while ensuring due process for complainants and respondents. This process does not preclude CCRPA from attempting to resolve complaints informally.

This Appeals Process applies to all complaints filed under Title VI of the Civil Rights Act of 1964, Executive Order 12898 regarding Environmental Justice, and Executive Order 13166 regarding Limited English Proficiency relating to any federally-funded program or activity administered by CCRPA or its subrecipients, consultants, and contractors. The process does not deny the right of the complainant to file complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. It does not include punitive damages or compensatory remuneration for the complainant. Intimidation or retaliation of any kind is prohibited by law.

CCRPA will make reasonable efforts to obtain early resolution of complaints at the lowest level possible. The option of informal mediation between the affected parties and CCRPA's Title VI Coordinator may be utilized for resolution at any stage of the process. The Title VI Coordinator will make reasonable efforts to pursue a resolution to the complaint.

CCRPA's Transportation Committee serves as its MPO Appeals Board.

PROCEDURE FOR FILING A FORMAL TITLE VI, EJ, OR LEP COMPLAINT WITH CCRPA

1. Any person who believes s/he has been subjected to discrimination prohibited under Title VI, Executive Order 12898, and/or Executive Order 13166 may file a complaint with CCRPA's Title VI Coordinator. The Coordinator will determine the jurisdiction of the complaint, acceptability, the need for additional information, and investigate the merit of the complaint. Complaints against CCRPA should be referred to the Title VI Coordinator for proper disposition. In cases in which the complaint is against one of CCRPA's subrecipients of federal funds, CCRPA may assume jurisdiction to investigate and adjudicate the case. CCRPA may provide itself or obtain services to review or investigate matters.

2. In order to be accepted, a formal complaint must meet the following criteria:
 1. The complaint must be in writing and signed and dated by all complainant(s).
 2. The complaint must be filed within 180 calendar days of the alleged occurrence(s) or when the alleged discrimination became known to the complainant.
 3. The complaint must be filed no later than 5 years after the alleged occurrence(s).
 4. The allegation(s) must involve a covered basis such as race, religion, color, national origin, or sex.
 5. The allegation(s) must involve an MPO-related program or activity of a Federal-aid recipient, subrecipient, consultant, or contractor.
 6. The complainant must accept reasonable resolution based on CCRPA's administrative authority (reasonability to be determined by CCRPA).
3. The formal complaint must include:
 1. The location and date of the alleged act of discrimination.
 2. The date when the complainant became aware of the alleged discrimination.
 3. Identity of the person(s) alleged to have discriminated against the complainant, including job titles of the person(s), and the organizations represented by the person(s).
 4. A detailed description of the incident.
4. The Title VI Coordinator shall notify the complainant and MPO Appeals Committee in writing within 21 calendar days of receipt of the complaint. The complaint will receive a case number and all information pertaining to the case will be logged into CCRPA's records.
5. The notification shall include a determination of complaint acceptance. Complaints failing to meet criteria 2(a) through (f) shall be deemed nonjusticiable and dismissed accordingly.
6. A complaint may also be dismissed for the reasons listed below.
 1. The complainant requests the withdrawal of the complaint.
 2. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
 3. The complainant cannot be located after reasonable attempts.
 4. The complaint is frivolous or harassing.
7. In cases where the Title VI Coordinator accepts a complaint and assumes its investigation (or appoints an investigator):

1. The Coordinator or investigator shall provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 14 calendar days from the date of the Title VI Coordinator's written notification of receipt of the complaint to furnish his/her response to the allegations.
 2. The Coordinator or investigator shall prepare an investigative report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.
 3. The investigative report shall be sent to the MPO Appeals Committee and CCRPA's Executive Director. The Appeals Committee and Executive Director will review the report and associated information and will provide feedback to the Investigator within 60 calendar days. The report will be modified as needed and made final for its release.
 4. CCRPA will notify the parties of its final decision.
 5. CCRPA's final investigative report and a copy of the complaint shall be forwarded to the Office of Civil Rights or equivalent office at the relevant federal agency (e.g., FHWA, FTA) within 7 calendar days of final report completion.
8. 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). The complainant has 180 calendar days after CCRPA's final resolution to appeal to USDOT. Unless the facts not previously considered come to light, reconsideration of appeal to CCRPA will not be available.

CONFLICT OF INTEREST STIPULATIONS

1. Should the complaint allege discrimination by the Title VI Coordinator against the complainant, the MPO Appeals Committee shall appoint an Ad Hoc Coordinator to investigate and address the complaint. The complainant and Ad Hoc Coordinator shall follow the process laid out above, with the temporary Coordinator standing in for the Title VI Coordinator.
2. Should the complaint allege discrimination by specific members of the MPO Appeals Committee, those members shall recuse themselves. Should recusals render a quorum of the MPO Appeals Committee impossible, the Central Connecticut Regional Planning Agency Board shall serve in lieu of the Committee.

CONTACT INFORMATION

Questions and comments may be directed in writing to CCRPA's Title VI Coordinator at:

Cheri Bouchard-Duquette
225 N Main St Ste 304
Bristol, CT 06010-4993
cheri@ccrpa.org

Additionally, Connecticut Department of Transportation Title VI complaints may be filed directly to:

Title VI Coordinator
CT Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131-7546

Federal Transit Administration (FTA) Title VI complaints may be filed directly to:

Title VI Program Coordinator
East Building, 5th Floor, TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Federal Highway Administration (FHWA) Title VI complaints may be filed directly to:

Investigations & Adjudication Team Director
FHWA Office of Civil Rights
1200 New Jersey Avenue, SE, Suite E-81
Washington, DC 20590

APPENDIX A: ENDORSEMENT

To be attached

APPENDIX B: COMPLAINT FORM

Complaint forms are available online at CCRPA's website. The form here is for reference.

CENTRAL CONNECTICUT REGIONAL PLANNING AGENCY

Serving Berlin, Bristol, Burlington, New Britain, Plainville, Plymouth, and Southington

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MPO Appeals Process complaint form

Please give your name and contact information.

Name: _____

Street Address: _____

City/State/Zip Code: _____

Phone: _____

Which of the following best describes the reason you believe the discrimination took place?

- Race, Color, Ethnicity National Origin Limited English Low-income
 Sex Age Disability Other reason

What date(s) and location(s) did the alleged discrimination take place?

Please list names and contact information of any witnesses.

Who allegedly discriminated against you? Please provide the name(s) of the individual(s), the job title of the person(s), and the agency(ies) represented by the person(s).

Please provide a description of the incident(s). Include how you feel that you were discriminated against and how other people, if any, were treated differently. Use additional pages as necessary.

Have you filed this complaint with any other local, state, or federal agency? Yes No

If yes, please provide the name of the agency and the contact person at that agency.

Signature and date: _____

You may include any additional pages and information pertaining to your complaint.

If you believe that a Federal Transit Administration (FTA) recipient has retaliated against you, immediately contact the FTA to investigate your allegation. Filing a complaint does not prevent an individual or group from seeking remedy through other sources.

Who may file a Title VI complaint?

A complaint may be filed by any individual or group that believes that they have been subjected to discrimination or retaliation based on their race, color, national origin, sex, age, disability/handicap and/or income level. The complaint may be filed by the affected party or a representative, and must be in writing.

What information do I include in my complaint?

A signed, written complaint should be filed within 180 days of the date of the alleged discrimination, including:

- Your name, address and telephone number. If you are filing on behalf of another person, include their name, address, telephone number and your relation to that person.
- The name and address of the agency, firm or department you believe discriminated against you.
- Your signature.
- A description of how, why, and when you believe you were discriminated against. Include as much background information as possible about the alleged acts.
- The names of individuals whom you allege discriminated against you if you know them.
- The names of any persons, if known, that can be contacted for additional information to support or clarify your allegations.

How can I file a discrimination complaint?

If you believe that a USDOT recipient has discriminated against you or others protected by Title VI, you may file a complaint. Complaints may be filed with any of the following person:

Debra Goss, Title VI Coordinator
CT Department of Transportation
Newington, CT 06131-7546
Tel: (860) 594-2169

Complaints may also be filed directly with the United States Department of Transportation (USDOT). For information on how to file a complaint directly with USDOT please contact Ms. Debra Goss.

**STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION**

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

TITLE VI

“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.” (42 U.S.C. 2000d)

This brochure is designed to assist you to understand your rights under the Title VI of the Civil Rights Act of 1964.

What is Title VI?

Title VI of the Civil Rights Act of 1964 is the Federal Law that protects individuals and groups from discrimination on the basis of their race, color, and national origin in programs and activities that receive Federal financial assistance. However, USDOT's reference to Title VI includes other Civil Rights provisions of Federal statutes and related authorities to the extent that they prohibit discrimination in programs and activities receiving Federal financial assistance.

Title VI Policy

Pursuant to Title VI of the Civil Rights Act of 1964, the Restoration Act of 1987 and other nondiscrimination authorities, it is the policy of ConnDOT that discrimination on the ground of race, color, national origin, disability/handicap, sex, age, or income status shall not occur in connection with programs or activities receiving financial assistance from the USDOT.

The Connecticut Department of Transportation will ensure that no person in the United States shall, on the grounds of race, color, national origin, sex, age or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the USDOT.

Title VI Compliance

Title VI compliance is a situation where a recipient has effectively implemented all the Title VI requirements or can demonstrate that every good faith effort has been made toward achieving this end.

USDOT Recipient

A USDOT Federal-aid recipient is any State, territory, possession, political subdivision, instrumentality, public or private agency, organization, entity or individual to whom USDOT assistance is extended either directly or through another recipient.

Programs Covered

Federally-assisted programs include any USDOT Project, program or activity for the provision of services, financial aid, and other benefits. This includes education or training, work opportunities, health,

welfare, rehabilitation, housing or other services, whether provided directly by the recipient or other agents, through contracts or other arrangements with the recipient.

What discrimination is prohibited by the ConnDOT Title VI Program?

Discrimination under our Title VI program is an act (action or inaction) whether intentional or unintentional, through which a person or group, solely because of race, color, national origin, disability/handicap, sex, age, or income status has been otherwise subjected to unequal treatment or impact, under any program or activity receiving financial assistance from USDOT.

In operating USDOT-assisted programs, a recipient cannot discriminate either directly or through contractual or other means by:

- Denying programs services, financial aids, or other benefits;
- Providing different program services, financial aids or other benefits, or providing them in manner different from that provided to others;
- Segregating or separately treating individuals or groups in any matter related to the receipt of any program service, financial aid or benefit;
- Restricting in any way the enjoyment of any advantage or privilege enjoyed by others receiving any program service, financial aid or other benefits;
- Denying person(s) the opportunity to participate as a member of a planning, advisory or similar body;
- Denying person(s) the opportunity to participate in the program through the provision of services, or affording the opportunity to do so differently from those afforded others.

