FTA TITLE VI PLAN

Endorsed by NVCOG Board of Directors June 14, 2019
Effective June 14, 2019

Prepared in conjunction with:
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INTRODUCTION

This Title VI Program Plan has been prepared to assist the Naugatuck Valley Council of Governments (NVCOG), the administrator of Greater Waterbury Transit District and Valley Transit District in ensuring compliance with Section 601 of Title VI of the Civil Rights Act of 1964, which states:

“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.”

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (USDOT), NVCOG and the Transit Districts have an obligation to ensure that:

- The benefits of its transit services are shared equitably throughout its service area;
- The level and quality of its services are sufficient to provide equal access to all riders in its service area;
- No one is precluded from participating in its service planning process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin; and
- A mechanism is in place for the remediation of any discrimination which may occur, even if such discrimination is unintentional

Within its available resources, and with full regard for the delivery of efficient and effective transit service, NVCOG, Greater Waterbury Transit District, and Valley Transit District will continue compliance with the regulations of the FTA and the spirit of the Civil Rights Act of 1964.

This plan supersedes the Valley Council of Governments’ Title VI Plan of 2016 and is effective as of June 14, 2019, as required. It has been prepared using data from the 2015 and 2017 American Community Survey. Additionally, the Plan recognizes the relationship of NVCOG, Greater Waterbury Transit District, and the Valley Transit District, with regard to Title VI planning, complaints, and procedures, to be synonymous as one entity where the NVCOG provides certain planning and programming for the Valley Transit District who provide transit service and operations.
INTRODUCTION

Furthermore, this plan applies to all instances of NVCOG’s use of FTA funding for planning and programming in other urbanized areas within its jurisdiction, outside of Valley Transit District’s service area.

Our Title VI Notice

To make the Naugatuck Valley Council of Governments and Valley Transit District’s service recipients aware of its commitment to Title VI Compliance—and of their right to file a Title VI Complaint—NVCOG and the Transit District have promulgated the following language on the homepage of their websites (www.valleytransit.org & www.nvcogct.gov), on posters at both facilities, and on all Valley Transit District buses.

Your Civil Rights

The Naugatuck Valley Council of Governments (NVCOG) and the Valley Transit District (VTD) are committed to providing non-discriminatory service to ensure that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964 (“Title VI”).

To request more information about Title VI, or to submit a written complaint if you believe that you have been subjected to discrimination, you may contact:

Naugatuck Valley Council of Governments
Office of Civil Rights & Title VI Compliance
49 Leavenworth Street, 3rd Floor
Waterbury, CT 06702

In addition to your right to file a complaint with the NVCOG or VTD, you have the right to file a Title VI complaint with:

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

U.S. Department of Transportation
Federal Transit Administration
Office of Civil Rights
Kendall Square
55 Broadway
Cambridge, MA 02142

Federal Highway Administration
U.S. Department of Transportation
Office of Civil Rights
1200 New Jersey Avenue, SE, Suite E81-105
Washington, DC 20590

If you need any language assistance or printed materials in another language please contact the Civil Rights Officer at gtiler@nvcogct.org or by phone at 203-757-0535.
INTRODUCTION

Authority

As a provider of paratransit services within the Lower Valley portion of the Naugatuck Valley planning region, NVCOG and VTD strive to fulfill the requirements and the spirit of relevant regulation.

This plan was prepared under the following regulatory framework:

| Title VI of the Civil Rights Act of 1964 | 42 U.S.C. § 2000d |
| DOT Implementing Regulations | 49 C.F.R. § 21 |
| | 23 CFR Part 200 |
| DOJ Implementing Regulations | 28 C.F.R. § 42.401 et seq. |
| | 28 C.F.R. § 50 |
| | EO 13166 |

Open FTA Grants

<table>
<thead>
<tr>
<th>Grant No.</th>
<th>Amount</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CT-2016-013</td>
<td>$1,367,398</td>
<td>Facility Design &amp; Rehab/Reconstruction</td>
</tr>
<tr>
<td>CT-2016-16</td>
<td>$1,000,545</td>
<td>VTD Facility Expansion &amp; Rehabilitation</td>
</tr>
<tr>
<td>CT-2016-014</td>
<td>$293,724</td>
<td>Route 8 Alternatives Study</td>
</tr>
<tr>
<td>CT-2018-015</td>
<td>$300,000</td>
<td>Bus Support EQ/Facilities and Administration</td>
</tr>
</tbody>
</table>

The Naugatuck Valley Council of Governments has four open grants with the FTA. In addition, NVCOG and VTD receive annual operating assistance from the Connecticut Department of Transportation.

Staff Training

Staff at the Naugatuck Valley Council of Governments will continue to attend Connecticut Department of Transportation, Federal Transit Administration (FTA)/Federal Highway Administration (FHWA) meetings and webinars that provide education and training related to Title VI. All education and training will be consistent with the state and federal polices and guidelines.
DEMographics

In order to best serve our users, NVCOG has prepared the following series of maps illustrating the demographics of the Valley Transit District and NVCOG service area. The goal is to better understand potential users and to channel investment towards assisting those who need it most.

All following data comes from the American Community Survey 2015 and 2017 5-year estimates. Because these data are estimates from a relatively small sample size, this profile is intended as an indication of facts on the ground, rather than an absolute description of the population. The Council of Governments has made use of existing plans and regional profiles of the service area from other organizations servicing the area to further support our conclusions, and to illustrate any trends surrounding the data.
NVCOG and VTD were able to determine that there exists a Hispanic population in the NVCOG and VTD service area, the majority of whom speak both English and Spanish (see Table 1 and Table 2). The Spanish-speaking population is concentrated in the urbanized communities of Derby, Ansonia, and Waterbury. It’s important to note that VTD’s transit services are typically used more frequently by elderly populations, whereas the Spanish-speaking population is relatively young. These facts indicate that there exists a Spanish-speaking population meeting the Safe Harbor threshold within VTD’s service area, but this population is less likely than the Spanish-speaking population in the region at large to encounter VTD’s transit services.

Additionally, we identified a Polish-speaking population in the VTD service area. The Polish-speaking population includes a growing population of elderly individuals, some of whom do not speak English proficiently. The total population of Polish speakers with limited English proficiency (LEP) is below 1,000 according to the 2015 ACS data (see Table 1), the population of Polish speakers eligible for transit services in the VTD district is a subset of this population. Using the proportion of the population 65 years and older as a proxy, we see that Polish-speakers are unlikely to be eligible for VTD transit services (see Table 2).

<table>
<thead>
<tr>
<th>Table 1: ACS 2015 B16001</th>
<th>Ansonia</th>
<th>Derby</th>
<th>Seymour</th>
<th>Shelton</th>
<th>Total</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>18,078</td>
<td>12,004</td>
<td>15,688</td>
<td>39,155</td>
<td>84,925</td>
<td>100.00%</td>
</tr>
<tr>
<td>who speak Spanish</td>
<td>2,508</td>
<td>1,796</td>
<td>770</td>
<td>1,879</td>
<td>6,953</td>
<td>8.19%</td>
</tr>
<tr>
<td>and speak English less than</td>
<td>705</td>
<td>604</td>
<td>178</td>
<td>565</td>
<td>2,052</td>
<td>2.42%</td>
</tr>
<tr>
<td>“very well”</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>who speak Polish</td>
<td>165</td>
<td>478</td>
<td>465</td>
<td>882</td>
<td>1,990</td>
<td>2.34%</td>
</tr>
<tr>
<td>and speak English less than</td>
<td>84</td>
<td>355</td>
<td>265</td>
<td>256</td>
<td>960</td>
<td>1.13%</td>
</tr>
<tr>
<td>“very well”</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Table 2: ACS 2017 B16004</th>
<th>Ansonia</th>
<th>Derby</th>
<th>Seymour</th>
<th>Shelton</th>
<th>Total</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population 65 and Over</td>
<td>2,803</td>
<td>1,924</td>
<td>2,236</td>
<td>8,417</td>
<td>15,380</td>
<td>100.00%</td>
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<tr>
<td>who speak Spanish</td>
<td>233</td>
<td>89</td>
<td>78</td>
<td>112</td>
<td>512</td>
<td>3.33%</td>
</tr>
<tr>
<td>and speak English “not well”</td>
<td>170</td>
<td>13</td>
<td>0</td>
<td>29</td>
<td>212</td>
<td>1.38%</td>
</tr>
<tr>
<td>or “not at all”</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>who speak another Indo-</td>
<td>119</td>
<td>150</td>
<td>136</td>
<td>868</td>
<td>1,273</td>
<td>8.28%</td>
</tr>
<tr>
<td>European language*</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>and speak English “not well”</td>
<td>36</td>
<td>26</td>
<td>13</td>
<td>245</td>
<td>320</td>
<td>2.08%</td>
</tr>
<tr>
<td>or “not at all”</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Note: Indo-European languages include Polish, Portuguese, and Italian: languages of which there is a population of speakers >200 in the region.
<table>
<thead>
<tr>
<th>Town</th>
<th>Total Population</th>
<th>who speak Spanish</th>
<th>and speak English less than “very well”</th>
<th>who speak Polish</th>
<th>and speak English less than “very well”</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ansonia</td>
<td>18,078</td>
<td>2,508</td>
<td>705</td>
<td>165</td>
<td>84</td>
</tr>
<tr>
<td>Beacon Falls</td>
<td>5,965</td>
<td>126</td>
<td>65</td>
<td>137</td>
<td>120</td>
</tr>
<tr>
<td>Bethlehem</td>
<td>3,429</td>
<td>15</td>
<td>0</td>
<td>16</td>
<td>8</td>
</tr>
<tr>
<td>Bristol</td>
<td>57,732</td>
<td>4,289</td>
<td>1,297</td>
<td>1,091</td>
<td>414</td>
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<tr>
<td>Cheshire</td>
<td>28,122</td>
<td>1,633</td>
<td>658</td>
<td>198</td>
<td>36</td>
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<tr>
<td>Derby</td>
<td>12,004</td>
<td>1,796</td>
<td>604</td>
<td>478</td>
<td>355</td>
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<tr>
<td>Middlebury</td>
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<td>162</td>
<td>26</td>
<td>64</td>
<td>4</td>
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<tr>
<td>Naugatuck</td>
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<td>2,051</td>
<td>610</td>
<td>194</td>
<td>64</td>
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<tr>
<td>Oxford</td>
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<td>58</td>
<td>49</td>
<td>15</td>
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<tr>
<td>Plymouth</td>
<td>11,408</td>
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<td>98</td>
<td>112</td>
<td>47</td>
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<tr>
<td>Prospect</td>
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<td>112</td>
<td>53</td>
<td>27</td>
<td>9</td>
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<tr>
<td>Seymour</td>
<td>15,688</td>
<td>770</td>
<td>178</td>
<td>465</td>
<td>265</td>
</tr>
<tr>
<td>Shelton</td>
<td>39,155</td>
<td>1,879</td>
<td>565</td>
<td>882</td>
<td>256</td>
</tr>
<tr>
<td>Southbury</td>
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<td>482</td>
<td>143</td>
<td>62</td>
<td>45</td>
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<td>7,465</td>
<td>86</td>
<td>0</td>
<td>11</td>
<td>0</td>
</tr>
<tr>
<td>Waterbury</td>
<td>101,664</td>
<td>26,534</td>
<td>9,948</td>
<td>342</td>
<td>137</td>
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<tr>
<td>Watertown</td>
<td>21,033</td>
<td>653</td>
<td>53</td>
<td>93</td>
<td>16</td>
</tr>
<tr>
<td>Wolcott</td>
<td>16,177</td>
<td>392</td>
<td>73</td>
<td>111</td>
<td>33</td>
</tr>
<tr>
<td>Woodbury</td>
<td>9,144</td>
<td>291</td>
<td>153</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Region</td>
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<td>44,443</td>
<td>15,287</td>
<td>4,497</td>
<td>1,908</td>
</tr>
<tr>
<td>Percent</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>10.48%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3.60%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1.06%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.45%</td>
</tr>
<tr>
<td>Location</td>
<td>Total Population</td>
<td>Estimated population 65 years and over</td>
<td>who speak Spanish</td>
<td>and speak English “not well” or “not at all”</td>
<td>who speak another Indo-European language*</td>
</tr>
<tr>
<td>----------------</td>
<td>------------------</td>
<td>----------------------------------------</td>
<td>-------------------</td>
<td>---------------------------------------------</td>
<td>------------------------------------------</td>
</tr>
<tr>
<td>Ansonia</td>
<td>18,116</td>
<td>2,803</td>
<td>233</td>
<td>170</td>
<td>119</td>
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<tr>
<td>Beacon Falls</td>
<td>5,866</td>
<td>902</td>
<td>28</td>
<td>28</td>
<td>0</td>
</tr>
<tr>
<td>Bethlehem</td>
<td>3,379</td>
<td>578</td>
<td>0</td>
<td>0</td>
<td>26</td>
</tr>
<tr>
<td>Bristol</td>
<td>57,567</td>
<td>9,590</td>
<td>484</td>
<td>277</td>
<td>1,234</td>
</tr>
<tr>
<td>Cheshire</td>
<td>28,203</td>
<td>5,075</td>
<td>64</td>
<td>0</td>
<td>447</td>
</tr>
<tr>
<td>Derby</td>
<td>11,959</td>
<td>1,924</td>
<td>89</td>
<td>13</td>
<td>150</td>
</tr>
<tr>
<td>Middlebury</td>
<td>7,383</td>
<td>1,553</td>
<td>4</td>
<td>0</td>
<td>176</td>
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<tr>
<td>Naugatuck</td>
<td>29,230</td>
<td>4,717</td>
<td>237</td>
<td>95</td>
<td>818</td>
</tr>
<tr>
<td>Oxford</td>
<td>12,412</td>
<td>2,150</td>
<td>16</td>
<td>16</td>
<td>104</td>
</tr>
<tr>
<td>Plymouth</td>
<td>11,264</td>
<td>1,917</td>
<td>8</td>
<td>0</td>
<td>106</td>
</tr>
<tr>
<td>Prospect</td>
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<td>1,864</td>
<td>16</td>
<td>0</td>
<td>110</td>
</tr>
<tr>
<td>Seymour</td>
<td>15,889</td>
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<td>78</td>
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<td>136</td>
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<td>Shelton</td>
<td>39,728</td>
<td>8,471</td>
<td>112</td>
<td>29</td>
<td>868</td>
</tr>
<tr>
<td>Southbury</td>
<td>18,682</td>
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<td>3</td>
<td>226</td>
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<tr>
<td>Thomaston</td>
<td>7,360</td>
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<td>25</td>
</tr>
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<td>Waterbury</td>
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<td>14,077</td>
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<td>964</td>
<td>1,607</td>
</tr>
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<td>Watertown</td>
<td>20,999</td>
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<td>588</td>
</tr>
<tr>
<td>Wolcott</td>
<td>15,974</td>
<td>2,759</td>
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<td>58</td>
<td>197</td>
</tr>
<tr>
<td>Woodbury</td>
<td>9,114</td>
<td>1,957</td>
<td>53</td>
<td>0</td>
<td>111</td>
</tr>
<tr>
<td>Region</td>
<td>424,136</td>
<td>73,220</td>
<td>3,540</td>
<td>1,653</td>
<td>7,048</td>
</tr>
</tbody>
</table>

Percent

| Total Population | 17.26% | 4.83% | 2.26% | 9.63% | 2.26% |

*Note: Indo-European languages include Polish, Portuguese, and Italian: languages of which there is a population of speakers >200 in the region.
Households with No Vehicle Owned by Block Group

- Less than 1.2%
- 1.3% - 4.7%
- 4.8% - 9.4%
- 9.5% - 15.5%
- Greater than 15.5%
Analysis

The NVCOG (which encompasses Greater Waterbury Transit District) and VTD region are relatively diverse areas. The minority population is concentrated in the more urbanized jurisdictions such as Waterbury, Ansonia, and Derby. According to the 2017 American Community Survey, Non-White residents comprise 61.5% of the population in Waterbury, 37% of the population in Ansonia, and 33.3% of the population in Derby. By analyzing the minority population and major languages spoken in the region, it is evident that the population centered around Waterbury, Ansonia, and Derby contains a large proportion of Spanish-speaking individuals. On the other hand, the region’s Polish-speaking population is mostly situated in Beacon Falls, Seymour, Derby, and Shelton. Many areas with large minority populations also live in households without a vehicle. As a result, the proportion of residents relying on public transportation to get to work is generally higher.

Identifying public transportation needs, particularly paratransit needs, is somewhat difficult in this region due to the existence of the Metro-North Railroad’s New Haven Line, several branches of which run within close driving distance of the region. This creates outlier block groups such as the one in southeast Shelton and central Naugatuck, where a relatively large share of the population uses public transportation to commute but few are minorities, few are in poverty, most households own a vehicle, and no fixed-route service is available. Even with this clarification, it is clear that there exists a transit-dependent population that likely contains a high proportion of Spanish speakers and a large proportion of households in poverty. It’s important to note that Waterbury contains a very high public transportation need due to the high percentage of residents utilizing public transit to get to work and the significant proportion of households without a car.
PUBLIC PARTICIPATION PLAN

The Naugatuck Valley Council of Governments and the Valley Transit District are required to submit a Title VI program every three years per FTA Circular 4702.1B. The Council of Governments and Transit District understand the importance of involving the public, especially members of underserved populations, in the development and planning of its Title VI program. The Council of Governments and the Transit District will utilize the following procedures to engage the public in its Title VI program.

This public participation plan applies to future updates of the Title VI plan, as well as to all fare changes and major service policies in the Valley Transit District.

- Title VI program updates will be posted on the NVCOG and the VTD websites.
- The Council of Governments and the Transit District will seek help from community leaders and organizations to facilitate involvement of traditionally underserved populations. Community leaders and organizations that represent these groups should be consulted about how to most effectively reach their members for public involvement in the Title VI program.

- Public meetings should be held in locations that are accessible by public transit. If a targeted population is located in a certain geographic area, then the meeting location should be in that area for their convenience.

- There will be a minimum of a thirty (30) day public comment period beginning with the first public notice.

- Any resulting change or action due to public comment or discussion will be documented in the NVCOG board meeting minutes.

- The Title VI program will take effect immediately following the decision of the NVCOG board meeting at which a vote on the Title VI program will be taken.

- All public meetings related to the Title VI program will be held at an ADA accessible facility.
PUBLIC PARTICIPATION

Summary of outreach since 2016
NVCOG is working on the ALT Mode Study for the Route 8 corridor. This project involves examining ways to promote transit-oriented development along eight nodes. NVCOG released a survey and embarked on a robust stakeholder process to engage communities through a series of workshops. In addition, NVCOG recently updated its Metropolitan Transportation Plan (MTP), this document outlines how the region hopes to utilize future federal and state transportation dollars. NVCOG also created a survey to collect public input from residents.

Language Assistance Plan
NVCOG and the Transit District recognize that there is a population within its service area who are not fluent in English. In order to better serve this population, NVCOG has completed the following Four Factor Analysis (process detailed in the Title VI circular) and subsequent Language Assistance Plan to discern what languages this population does speak and how NVCOG and the Transit District can best serve them. The results of this plan have been incorporated into the above Public Participation Plan.

Four Factor Analysis
Under guidance from the U.S. Department of Transportation, the Council of Governments and Transit District are obligated to determine the extent of its obligation to provide LEP services to its transit population. This determination must be based on an analysis of four factors:

Factor #1 The number or proportion of Limited English Proficiency persons who may be serviced or are likely to encounter a program, activity or service

Factor #2 The frequency with which Limited English Proficiency persons come in contact with programs, activities or services

Factor #3 The nature and importance of programs, activities or services to the LEP population

Factor #4 The resources available to the recipient and overall costs to provide LEP assistance
An analysis of these four factors are on the following pages, as well as information about how NVCOG and VTD address these factors individually and holistically.

**Factor 1**

**Number & Proportion of LEP Persons Likely to Be Serviced**

NVCOG and the Transit District have worked with 2015 and 2017 American Community Survey data—and with local social service organizations—to ascertain which LEP populations exist in the Valley Transit District.

NVCOG and the Transit District were able to determine that there exists a sizable transit-dependent Hispanic population, concentrated in the more urbanized cities of Waterbury, Derby, and Ansonia. This population is clearly an integral portion of several towns in the NVCOG region.

Additionally, there exists a small Polish-speaking population in Derby and Ansonia. Through discussion with local service agencies and churches, it is apparent that this population is not as transit-dependent and predominantly speaks English in addition to Polish. This population does not meet the Safe Harbor threshold. The only non-English speaking population that meets the Safe Harbor Threshold is Spanish.

See the Demographic Profile for a more complete analysis of the number and proportion of LEP populations in the Transit District.

**Factor 2**

**Frequency of contact**

LEP populations in the District encounter the transit programs provided by VTD only rarely, as few LEP individuals in the region are dependent upon paratransit services. From conversations with other social service providers, NVCOG and VTD do expect the frequency of contact with LEP populations to increase, primarily amongst native Spanish speakers.

The primary contact between our service population, including LEP individuals, and VTD occurs at two points: the schedule of the ride and the ride itself. VTD maintains a Spanish-speaking staff member during business hours to assist Spanish-speaking LEP individuals with ride scheduling. Additionally, several partner organizations have committed to providing over-the-phone translation services when necessary (see the Language Assistance Plan below). Family members have also been known to call VTD in order to schedule rides on behalf of LEP transit riders.

During the ride itself, the primary contact is upon pickup. Many LEP individuals in the Transit District live with a younger proficient English speaker who often assists in the process. VTD also allows for companion riders who can serve an interpretive role.

**Factor 3**

**Nature / Importance of Program**

The paratransit services provided by VTD are of great importance to the population dependent upon them,
though that population is small. VTD provides ADA transit services to populations unable to access existing fixed route service in the District provided by other transit providers. VTD also provides non-emergency medical transportation for its riders. While very few LEP individuals are dependent upon VTD’s services, VTD’s services are vital to those who are dependent.

**Factor 4**

**Resources Analysis**

While the LEP population in the Transit District is small, the Valley region is strong in its support of these individuals. VTD has few vital documents to translate, and maintaining staff members who speak Spanish and connections with other local outreach organizations and non-profits eases translation costs. Organizations partnered with NVCOG and VTD to serve the LEP population are listed in Table 5 to the right.

**Language Assistance Activities**

From the above analysis, the Council of Governments and Transit District have concluded that providing Spanish-language assistance is important to best serve our target population. Furthermore, the Spanish-speaking population meets the Department of Justice’s Safe Harbor provision, requiring translation of vital documents. NVCOG and VTD make extensive efforts to transmit information to the public in Spanish in addition to English, including making the following materials available in Spanish to the service area:

- Valley Transit District Website
- Naugatuck Valley Council of Governments Website
- Title VI Notice of Rights
- Title VI Complaint Form
- Interior Bus Notifications
- Surveys

The Valley Transit District also retains one customer service representative who is fluent in Spanish and is available on all business days.

In addition to these services, occasionally a Spanish-speaking LEP individual calls to schedule a ride when our representative is unavailable. In these cases VTD customer service representatives are able to take down their information and make contact with one of our partners to provide interpretive services. Once interpretive assistance is secured, the rider is contacted and the ride is scheduled. This does not delay the ride, even if the time between the call and the translation eclipses VTD’s default deadline for ride scheduling.

Additionally, a small Polish-speaking population lives in the region. Through the above analysis, NVCOG and VTD have concluded that this population does not require the same level of language ser-
vices that the Spanish-speaking population requires, primarily due to the availability of adult family members who speak English fluently. The Council of Governments and the Transit District have added a Polish translation of our Title VI notification to all of our vehicles, and posted in both offices, as our resource analysis allowed for it. NVCOG and VTD have also provided Polish versions of our respective websites. The needs of the Polish-speaking population will continue to be monitored.

<table>
<thead>
<tr>
<th>Product</th>
<th>Spanish Translation</th>
<th>Public Hearing/Meeting Interpretation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Long Range Transportation Plan</td>
<td>Upon Request</td>
<td></td>
</tr>
<tr>
<td>Public Participation Plan</td>
<td>Entire Document</td>
<td>Upon Request</td>
</tr>
<tr>
<td>Title VI Plan</td>
<td>Upon Request</td>
<td></td>
</tr>
<tr>
<td>Environmental Justice Policy</td>
<td>Entire Document</td>
<td>Upon Request</td>
</tr>
<tr>
<td>Planning Studies</td>
<td>Community context determines translation &amp; interpretation</td>
<td></td>
</tr>
</tbody>
</table>

Monitoring, Evaluating, and Updating the Limited English Proficiency Plan

The Naugatuck Valley Council of Governments will continuously monitor, evaluate and update the Limited English Proficiency Plan to ensure consistency with Title VI requirements. The monitoring of the Limited English Proficiency Plan will include:

- Annual monitoring of the United States Census Bureau’s American Community Survey (ACS) data (5 Year Estimates) to ensure that any changing patterns of LEP Populations will be addressed in the Limited English Proficiency Plan.

- Tracking Requests for Translated Documents via NVCOG’s website, public meetings, etc.

- Ongoing review of Google Translate requests at NVCOG’s website
PUBLIC PARTICIPATION

Makeup of Boards

The primary mechanism for decision-making for VTD is the Board of Commissioners. This is the overall governing and policy-setting body and consists of 10 members representing the four municipalities which comprise the service area. The Board meets monthly at regularly scheduled public meetings which are publicly noticed. Members are appointed to one-year terms by the Chief Elected Officials of the municipalities of Ansonia, Derby, Seymour, and Shelton. The number appointed for each municipality is set by a formula based on the populations of the represented municipalities, as set forth in Chapter 103A of the Connecticut General Statutes, and is presently as follows:

<table>
<thead>
<tr>
<th>Municipality</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ansonia</td>
<td>1</td>
</tr>
<tr>
<td>Derby</td>
<td>2</td>
</tr>
<tr>
<td>Seymour</td>
<td>2</td>
</tr>
<tr>
<td>Shelton</td>
<td>3</td>
</tr>
</tbody>
</table>

Of the total membership, 8 are Caucasian (4 males and 4 females) of which 1 is a disabled female.

The Greater Waterbury Transit District (GWTD) Board meets at least four times per year and consists of 14 members across nine municipalities. Board members are appointed by their municipality. The District may assume any or all of the powers granted to transit districts under CGS § 7-273d. GWTD oversees Non-ADA paratransit and Dial-A-Ride services throughout the region. The composition of the Board presently follows:

<table>
<thead>
<tr>
<th>Municipality</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cheshire</td>
<td>2</td>
</tr>
<tr>
<td>Middlebury</td>
<td>1</td>
</tr>
<tr>
<td>Naugatuck</td>
<td>2</td>
</tr>
<tr>
<td>Prospect</td>
<td>1</td>
</tr>
<tr>
<td>Southbury</td>
<td>1</td>
</tr>
<tr>
<td>Thomaston</td>
<td>1</td>
</tr>
<tr>
<td>Waterbury</td>
<td>4</td>
</tr>
<tr>
<td>Watertown</td>
<td>1</td>
</tr>
<tr>
<td>Wolcott</td>
<td>1</td>
</tr>
</tbody>
</table>

Of the total membership: 11 are Caucasian, 2 are African American, and 1 is Hispanic. All 14 Board members are female.
The Naugatuck Valley Council of Governments (NVCOG) consists of a 19-member Board. Each of the 19 municipalities in the NVCOG region is allocated one voting member. The Board meets monthly at regularly scheduled public meetings which are publicly noticed. The members of the Board are listed below:

Ansonia: David Cassetti, Mayor
Beacon Falls: Christopher Bielik, First Selectman
Bethlehem: Leonard Assard, First Selectman
Bristol: Ellen Zoppo-Sassu, Mayor
Cheshire: Rob Oris, Jr., Town Council Chairman
Derby: Richard Dziekan, Mayor
Middlebury: Edward St. John, First Selectman
Naugatuck: N. Warren "Pete" Hess, Mayor
Oxford: George Temple, First Selectman
Plymouth: David Merchant, Mayor
Prospect: Robert Chatfield, Mayor
Seymour: W. Kurt Miller, First Selectman
Shelton: Mark Lauretti, Mayor
Southbury: Jeffrey Manville, First Selectman
Thomaston: Edmond Mone, First Selectman
Waterbury: Neil O'Leary, Mayor
Watertown: Thomas Winn, Town Council Chairman
Wolcott: Thomas Dunn, Mayor
Woodbury: Barbara Perkinson, First Selectman

Of the total membership, 19 are Caucasian (17 males and 2 females).
In addition to the above procedures and processes, full Title VI compliance requires the following explicit information:

**Subrecipient Monitoring**

The Naugatuck Valley Council of Governments is a direct recipient of FTA funds and has no subrecipients.

**Facility Construction**

Title 49 CFR Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.”

Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.”

NVCOG and VTD acknowledge their responsibility to complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. This process will include outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis would compare the equity impacts of various siting alternatives, and occur before the selection of the preferred site. When evaluating locations of facilities, NVCOG will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis will be done to ensure that proper perspective is given to localized impacts. If NVCOG determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, it may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin.
VTD Maintenance & Operations Facility

The Naugatuck Valley Council of Governments is overseeing the construction and renovation of the Valley Transit District maintenance and operations facility through funding from FTA grant CT-2016-16. A needs and deficiency study was conducted and a preferred alternative was selected by the Valley Transit District board of directors. The preferred alternative involves an entire overhaul of HVAC, plumbing, electrical, and mechanical systems, as well as an addition to the maintenance bay, bus storage bay, and dispatch center. The existing building will remain and will be added onto. No additional land will be built upon; the renovations will be completely within the existing property footprint with no additional property required. This project qualified for a Categorical Exclusion.

This Categorical Exclusion is based on the renovation of an existing facility that will not expand beyond the existing site, and will not require the acquisition of additional land. More specifically, the renovations include the replacement and upgrade of the facilities mechanical systems which are located within the building. Additionally, there will two additions to the building which also do not extend beyond the existing site. A full environmental report was prepared.
APPENDICES

The following documents are appended:

- NVCOG Organizational Chart
- Title VI Discrimination Complaint Form
- Title VI Complaint Log
- List of Title VI Complaints
- Title VI Discrimination Complaint Process
- NVCOG Board Endorsement
Naugatuck Valley Council of Governments

Board of Directors
Officers:
Chairman: Neil O'Leary, Waterbury
Vice Chairman: Mark Lauretti, Shelton
Secretary: Ed Mone, Thomaston
Treasurer: Pete Hess, Naugatuck

Executive Director: Rick Dunne

EEO/DEBELO Officer: Gabriel Filer

Financial Director
Director of Planning
Administrative Staff
Naugatuck Valley Council of Governments/Valley Transit District
Title VI Discrimination and Complaint Form

Complaint’s Name: ____________________________________________________________

Street Address: _______________________________________________________________________

City/State/Zip: ______________________________________________________________________

Phone: _____________________________ E-Mail (if available): ____________________________

Title VI Discrimination Complain because of: ____ Race     ____ Color     ____ National Origin

(FHWA complaints only) ____ Disability

Please provide the date(s) and location(s) of the alleged discrimination, the name(s) of the individual(s) who allegedly discriminated against you, including their titles (if known).
________________________________________________________________________________________
________________________________________________________________________________________

Please provide the names, addresses and telephone numbers of any witnesses.
________________________________________________________________________________________
________________________________________________________________________________________

Explain as briefly and as clearly as possible; what happened, how you felt that you were discriminated against and who was involved. If applicable, please include how other persons were treated differently from you in the same circumstances.
________________________________________________________________________________________
________________________________________________________________________________________

Signature: _____________________________________________      Date: ___________________________

Deliver, mail or e-mail this form to:
Mr. Gabriel Filer, Civil Rights Officer
Naugatuck Valley Council of Governments
49 Leavenworth Street, 3rd Floor
Waterbury, Connecticut 06702

NVCOG will provide this form to:
Title VI Coordinator,
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131-7546

You may use additional sheets of paper if necessary. Also, please include any written materials pertaining to your complaint. Please contact our office if you need printed materials in another language. Should you have any further questions or want to submit the Title VI Complaint Form you may contact the Civil Rights Officer at gfiler@nvcogct.org or by phone at 203-757-0535.
<table>
<thead>
<tr>
<th>No.</th>
<th>Date of Complaint</th>
<th>Summary of Allegations</th>
<th>Status of Investigation</th>
<th>Lawsuit or Complaint</th>
<th>Action Taken</th>
<th>Status of Investigation</th>
<th>Final Disposition</th>
</tr>
</thead>
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</tbody>
</table>
List of Title VI Investigations, Complaints & Lawsuits

The Naugatuck Valley Council of Governments maintains a Log of all Title VI Investigations, Complaints and Lawsuits filed against the agency. To date, no investigations, complaints or lawsuits have been filed against the Naugatuck Valley Council of Governments. If an investigation, complaint or lawsuit arises the Naugatuck Valley Council of Governments will immediately notify the Connecticut Department of Transportation’s Office of Contract Compliance.
Naugatuck Valley Council of Governments/Valley Transit District (NVCOG/VTD) Title VI Compliance Procedures

I. NVCOG/VTD’s Title VI Complaint Process

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the NVCOG/VTD may file a Title VI complaint by completing and submitting the NVCOG/VTD Title VI Complaint Form. The NVCOG/VTD investigates complaints received no more than 180 days after the alleged incident. The NVCOG/VTD will process complaints that are complete.

Once the complaint is received, NVCOG/VTD will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. NVCOG/VTD will notify the Connecticut Department of Transportation’s Title VI Coordinator of any Title VI complaints filed, within 10 business days of receipt.

NVCOG/VTD has 90 days to investigate the complaint. If more information is needed to resolve the case, NVCOG/VTD may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, NVCOG/VTD can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or any other action will occur. If the complainant wishes to appeal the decision, she/he has 10 calendar days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Connecticut Department of Transportation, Office of Contract Compliance, Attn: Title VI Coordinator, 2800 Berlin Turnpike, Newington, CT 06111; or directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

II. NVCOG/VTD’s Title VI investigation process

a) Investigation – An investigation is an official inquiry for the purpose of determining whether there has been a violation of the laws or statutes and includes a determination
of appropriate relief where a violation has been found. An investigation requires an objective gathering and analysis of the evidence, which will ensure that the final decision is as accurate as possible.

b) Role of the Investigator – The investigator is a neutral party provided by the Transit Authority to conduct an investigation of the issues raised in a complaint. The Investigator’s behavior, demeanor, and attitude reflect the Transit District and may affect the degree of cooperation received from the parties. The investigator has an obligation to identify and obtain relevant evidence from all available sources in order to resolve all of the issues under investigation. **The investigator is not an advocate for the Complainant or the Respondent.** The Investigator is a neutral fact finder.

c) Responsibilities of the Investigator – The investigator must:

- Never tell the parties that the complaint represents a good case or that the complaint is frivolous
- Never express his/her opinion
- Always remain neutral.
- Write the facts, and state what the facts are, based upon the evidence of testimony
- Decide who is to be interviewed. If the Complainant or the respondent is adamant about a witness interview, perform the interview
- Decide when sufficient evidence has been gathered to begin writing the investigative report
- Always remain professional and polite
- Be a good listener

d) The investigative process includes the following:

- Investigative Report
- Request for information
- Conducting interviews
- On-site visit
- Obtain evidence
- Analyze data
- Writing the Investigative Report

e) Investigative Report – The Investigative Report is a working document intended to define the issues and provide a roadmap to complete the investigation. It is also an internal document for use by the Investigator and his/her supervisor to keep the Investigation on track and focused on the relevant issues. It is the Investigator’s checklist, and the following elements should be contained in an Investigative Report:

- Complainant(s) name and address
- Attorney for Complainant with name and address
- Respondent(s) name and address
- Attorney for Respondent with name and address
- Applicable Law (e.g. Title VI)
- Basis
- Issue(s)
- Background
- Name of person(s) to be interviewed, including questions for the Complainant, Respondent, and Witness(es)
- Evidence to be obtained during the investigation

f) Conducting Interviews – When preparing for the interview, the main objective is to obtain information from witnesses who can provide information that will either support or refute the allegations. A list of major questions will be prepared that address the issues involved in the complaint.

1.) Complainant – The purpose of interview is to gain a better understanding of the situation outlined in the complaint of discrimination. The Investigator will contact the Complainant to ensure that Investigator understands the Complainant’s allegation(s). It is recommended that the Investigator interview the Complainant prior to preparing the investigation report. If it is not possible, the Investigator will make any changes as appropriate to the Investigation Report Form, based upon any new information provided by the Complainant. The Investigator will always inquire of the Complainant whether he/she desires to resolve the complaint.

2.) Respondent – Respondents are interviewed to provide an opportunity to respond to the allegations raised by the Complainant. Additionally, it provides the Investigator with an opportunity to understand the Respondent’s operation or policies that the Complainant cites. As the keeper of the records, the Investigator will discuss the investigation with the Respondent, and be able to explain the need for requesting any documentation on the Investigators list. The Investigator will inform the Respondent that he/she has the right to submit a formal position statement addressing the Complainant’s allegations. The Investigator will question the Respondent regarding possible settlement or remediation opportunities.

3.) Witness – The Complainant or Respondent may request that additional persons be interviewed. The Investigator will determine what relevant information, if any, a witness has to provide prior to conducting an interview with them. The Investigator will only interview persons who have information relevant to the allegations raised in the complaint of discrimination.

g) On-Site Visit – An on-site visit will be conducted when:

- Personal contact with the Complainant and the Respondent may yield information and clarification that might not otherwise be discovered by only reviewing the written document or telephone contacts.
- It is necessary to review the physical environment.
• More effective communication can be established with representative and witnesses of the Complainant and Respondent.
• Documentation can only be examined on-site for reasons of convenience, cost, format, or volume.

h) Obtaining Evidence – Evidentiary requests shall be related to the issues cited in the complaint. An evidentiary request may contain some or all of the following:

• The policies and procedures regarding the practice that the Complainant has alleged
• All documents relating to Respondent’s dealing with Complainant in the situation described in the complaint
• Documents which exhibit how others not in the Complainant’s group were treated under similar circumstances
• Respondent’s reason for the action taken
• A formal position statement from Respondent addressing Complainant’s allegations

There are various classifications of evidence, which include the following:

• **Circumstantial Evidence** – Includes facts from which may be inferred intent or discriminatory motive and proves intent by using objectively observable data.
• **Comparative Evidence** – A comparison between similarly situated individuals.
• **Direct Evidence** – Related to the Respondent’s motive, it is defined as any statement or action by an official of the Respondent that indicates a bias against members of a particular party.
• **Documentary Evidence** – Written material, which is generated during the course of normal business activity.
• **Statistical Evidence** – Statistics, facts, or data of a numerical type, which are assembled, classified, and tabulated so as to present significant information about a given subject.
• **Testimonial Evidence** – Evidence that is provided orally.

i) Analyzing Data – Data will be analyzed to determine whether a violation has occurred. When analyzing data, the Investigator will:

• Review what happened to the Complainant.
• Compare Complainant’s treatment with the appropriate policies and procedures
• Compare Complainant’s treatment with others in the same situation
• Review Respondent’s reason(s) for the treatment afforded the Complainant
• Compare Respondent’s treatment of the Complainant with the treatment afforded others

j) Writing the Investigative Report – The Investigative Report (IR) will contain the following sections:

• Complainant(s) name and address
• Respondent(s) name and address
• Applicable Law
• Basis
• Issues
• Findings for each issue with a corresponding conclusion for each issue
• Recommendation
RESOLUTION 2019-18

ENDORSEMENT
TITLE VI PLAN UPDATE FOR THE
NAUGATUCK VALLEY COUNCIL OF GOVERNMENTS

I certify that the following is a true copy of the vote of the Naugatuck Valley Council of Governments at its meeting on June 14, 2019 in Waterbury, Connecticut, at which a quorum was present.

WHEREAS, the Federal Transit Administration (hereinafter “FTA”) requires that each Direct Recipient of FTA assistance develop and maintain a Title VI program plan which adheres to US Department of Transportation regulations contained in 49 C.F.R. § 21;

WHEREAS, the Connecticut Department of Transportation requires the Naugatuck Valley Council of Governments to submit a separate Title VI program plan for FHWA;

WHEREAS, the Naugatuck Valley Council of Governments (hereinafter “NVCOG”) is a Direct Recipient of FTA and FHWA financial assistance;

WHEREAS, the NVCOG has developed a Title VI program plan consistent and in conformity with the regulations contained in 49 C.F.R. § 21, and the Title VI program plan was presented to NVCOG Board at the June 14, 2019 meeting and a public hearing was held on May 14 and May 16.

BE IT RESOLVED, that the NVCOG endorses and adopts the Title VI program plan update, as presented for the Naugatuck Valley Council of Governments, and authorizes Rick Dunne, Executive Director of the NVCOG, to submit the Title VI program plan update to the FTA.

Dated at Waterbury, Connecticut on 6-14-19, 2019

Agency: Naugatuck Valley Council of Governments

Signed Ed Mone, Secretary