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I. Introduction

The purpose of this review was to examine the state of Title VI compliance at the metropolitan level and establish a baseline for future reviews. The review identified best practices as well as recommendations for improving compliance with Title VI regulations.

Metropolitan Planning Organizations (MPOs) serve as the primary forum where State Department of Transportation (DOT), transit providers, local agencies, and the public develop local transportation plans and programs that address a metropolitan area's needs. Additionally, the Rural Planning Agencies play a similar role for the rural areas of the State. MPOs and Rural Planning Agencies can help local public officials understand how Title VI and environmental justice requirements improve planning and decision-making.

To certify compliance with Title VI and address Environmental Justice (EJ), MPOs need to:

- Enhance their analytical capabilities to ensure that the long-range transportation plan and the transportation improvement program (TIP) comply with Title VI.
- Identify residential, employment, and transportation patterns of low-income and minority populations so that their needs can be identified and addressed, and the benefits and burdens of transportation investments can be fairly distributed.
- Evaluate and - where necessary - improve their public involvement processes to eliminate participation barriers and engage minority and low-income populations in transportation decision-making.

II. The Committee

A committee consisting of planners and civil rights experts from the Connecticut Department of Transportation (ConnDOT), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) was formed. Below is the list of committee members.

Connecticut Department of Transportation

Neil Ryan, Transportation Planner II
Richard Corona, Supervising Planner
Kathryn Faraci, Transportation Planner II
Grayson Wright, Transportation Planner II

Debra Goss, Affirmative Action Officer
Mark Phillips, Supervising Planner
Maribeth Wojenski, Supervising Planner

Federal Highway Administration
Michael Chong, Community Planner
Lester Finkle, Civil Rights Officer

Barbara Breslin, Community Planner
Kimberly Michaud, Program Support Assist.

Federal Transit Administration
Andrew Motter, Community Planner

Margaret Griffin, Civil Rights Officer

III. The Process

The committee interviewed each MPO in the state of Connecticut, which included a review of the written responses to specific questions (Appendix A) adapted from the Federal Register (Vol. 65, No.98/Friday, May 19, 2000/Rules and Regulations) and a discussion session with each MPO individually. The committee also interviewed the four Rural Planning Regions in the State. The purpose of these meetings was to discuss Title VI and encourage the Regions to promote the guiding principles of Title VI in their planning processes and establish formal procedures within their planning processes. Appendix A includes documentation submitted by each MPO and Rural Region regarding Title VI activities.

IV. Title VI, Environmental Justice, & Limited English Proficiency: Relationship and Application

Title VI

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that *no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.* Areas of emphasis include the following:

- *No person in the United States*—The word “person” includes citizens as well as persons not lawfully present in the United States (illegal aliens). The phrase “in the United States” refers specifically to the fifty states of the Union. However, due to Title VI’s relationship to the 5th and 14th Amendments to the Constitution (one amendment applies to the states and one applies to the states and the territories), Title VI is broadly interpreted to apply to the states and the territories.
- *Program or Activity*—The Civil Rights Restoration Act of 1987 amended Title VI and related statutes by adding an expansive definition of “program or activity”. Therefore, the term “program or activity” applies to (1) *a department, agency, special purpose district, or other instrumentality of a State or of a local government; or (2) the entity of such State or local government that distributes such assistance and each such department or agency (and each other State or*

local government entity) to which the assistance is extended, in the case of assistance to a State or local government. A Regional Planning Organization receiving federal assistance satisfies this definition.

- *Receiving federal financial assistance through the State*—Federal financial assistance is the award or grant of money. In addition, Federal financial assistance may be in non-monetary form. Federal financial assistance may include the following: use or rent of Federal land or property at below market value, Federal training, a loan of Federal personnel, subsidies, and other arrangements with the intention of providing assistance. Federal financial assistance **does not** include the following: contracts of guarantee or insurance, regulated programs, licenses, procurement contracts by the Federal government at market value, or programs that provide direct benefits.

Title VI applies directly to race, color, and national origin. There are three additional “cross-cutting” Congressional statutes that prohibit discrimination on other grounds in federally assisted programs or activities. These include the following: Title IX (prohibits discrimination in education programs on the basis of sex), Section 504 (prohibits discrimination on the basis of disability), and the Age Discrimination Act (prohibits discrimination on the basis of age). Congress modeled these statutes after Title VI. Therefore, when Title VI is referenced, sex and disability and age are generally linked with race and color and national origin.

Environmental Justice

Executive Order 12898 (“Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”) required each federal agency to develop a written strategy to identify and address disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income communities. This can be realized through the development and implementation of an integrated approach towards Environmental Justice (EJ) through the collection, analysis, and dissemination of understandable and useful information on the adverse environmental and health impacts on protected populations. Through the National Environmental Policy Act of 1969 (NEPA) process, the EJ analysis is included as an individual section of the environmental document and is thereby disseminated to the public. For a Regional Planning Organization (RPO), the EJ analysis is included as another area of study under Title VI during the Planning process for transportation projects, plans and programs. Additionally, RPOs should analyze the impact of benefits provided by the RPO upon low-income and minority communities within the RPO’s boundaries. This should include benefits already offered as well as benefits to be offered.

There are three fundamental EJ principles. The principles are as follows:

- 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;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and

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

Environmental Justice is applicable to persons belonging to any of the following groups:

- **Black**—a person having origins in any of the black racial groups of Africa.
- **Hispanic**—a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- **Asian**—a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.
- **American Indian and Alaskan Native**—a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.
- **Native Hawaiian or Other Pacific Islander**—a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- **Low-Income**—a person whose household income (or in the case of a community or group, whose median household income) is at or below the U.S. Department of Health and Human Services poverty guidelines.

Limited English Proficiency

Executive Order 13166 (“Limited English Proficiency”) affirmed the obligation to eliminate limited English proficiency (LEP) as an artificial barrier to full and meaningful participation in all federally assisted programs and activities. In addition, the Executive Order expanded the obligation to address the language needs of LEP persons beyond federally assisted programs and activities to include federally conducted programs and activities. A recipient is required to evaluate how a LEP person’s inability to understand oral and written information provided by and about a federally assisted program or activity might adversely impact his or her ability to fully participate in or benefit from that program or activity. The guiding principle of the LEP Guidance is a four-factor analysis of “reasonableness”. The four-factors are as follows:

- Number or proportion of LEP persons in the eligible service population;
- The frequency with which LEP individuals come in contact with the program;
- The importance of the service provided by the program; and
- The resources available to the recipient.

Utilizing these four-factors, a RPO should determine what, if any, language mitigation measures are reasonably necessary to eliminate or minimize LEP as a barrier to participation in or receipt of the benefits of a federally assisted program or activity.

The USDOT published policy guidance on Title VI’s prohibition against national origin discrimination as it affects LEP persons. A synopsis of the USDOT guidance can be found in Appendix B; this synopsis was provided to each MPO and Rural Region in the State.

Coordinated Relationship

Title VI, being a portion of a Congressional statute, is the area of emphasis. Within the Planning process, each RPO should have a Title VI area of analysis for all federally assisted transportation projects as well as programs and activities (eg. Long Range Plan and Transportation Improvement Program). As a part of this Title VI analysis, a study should be performed to ensure that development and urban renewal benefiting a community, as a whole, should not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the targeted communities (low-income and minority communities). This should include providing minority and low-income communities access to public information on, and an opportunity for public participation in, matters relating to human health or the environment as it is affected by transportation projects and programs.

Four strategies that may be pursued to implement this analysis are as follows:

- Promote enforcement of all health and environmental statutes in areas with minority and low-income populations;
- Ensure greater public participation;
- Improve research and data collection relating to the health of and environment of minority and low-income populations; and
- Identify differential patterns of consumption of natural resources among minority and low-income populations.

As a portion of this analysis, a study of impacts relating to outreach to LEP persons should be performed. LEP populations (if any) should be identified and a “reasonableness” decision made as to the need to provide additional resources to promote participation in the public process.

Regarding a benefits analysis, if a RPO is offering public transportation, studies involving possible impacts to minority/low-income communities and LEP persons should be performed as part of the Title VI analysis.

V. Guidance to Achieve Compliance with Title VI, Environmental Justice, and Limited English Proficiency

Below is a list of basic guidance to assist the Regional Planning Organizations to achieve compliance with the many aspects of Title VI, EJ and LEP legislative requirements. This guidance as well as the legal requirements discussed above should be reviewed and where applicable implemented by the Regional Planning Organizations. The guidance is grouped into two categories: Planning Processes and Products and Public Outreach.

Planning Processes and Products

- Integrate the EJ process into the Title VI Process.
- Emphasize Title VI in the Planning Process.

- Produce a Title VI Action Plan.
- Expand the identification process for LEP groups.
- Incorporate LEP procedures in the Public Participation Plan, including identification procedures.
- Examine the use of Block Groups as opposed to Census Tracts to identify the location of the targeted groups.
- Update the targeted group locations using the 2000 Census Data
- Review and expand the project selection criteria to include Title VI elements, in particular the STP Urban Program and the FTA 5310 vehicle selection process.
- Identify and analyze the benefits and burdens of the planning process and products, as well as projects, and implement the recommended changes.

Public Outreach

- Identify community groups, and expand public outreach to the targeted community groups during TIP adoption and LRP update
 - Evaluate public outreach efforts, including a review of the effectiveness of the process to identify what is working and opportunities for improvement
 - Indicate access to LEP documentation on RPO websites, agendas, and other means, including an indication of availability of documentation in the alternative language.
 - Consider the translation of brochures, pamphlets, and documents where practical.
 - Expand the mailing list to include alternative language newspapers.
 - Participation of representatives from targeted communities on RPO boards.
 - Establish a Title VI/EJ Advisory Committee.
 - Examine and update website to include alternative language information.
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Capitol Region Council of Governments

The Capitol Region Council of Governments (CRCOG) was established as the Capitol Region Planning Agency in 1959 to serve the greater Hartford area. It has served as the Metropolitan Planning Organization for this portion of Connecticut since 1973 as the Capitol Region Council of Governments. The Capitol Region is also part of the larger Hartford Transportation Management Area, which includes the Central Connecticut Regional Planning Agency and the Midstate Regional Planning Agency. The Council board consists of mayors and first selectmen from the 29 municipalities in the Greater Hartford area.

The population of the Region is approximately 721,000. At the municipal level the cities of Hartford, East Hartford, Windsor, Bloomfield, Manchester, and West Hartford demonstrate the highest degree of ethnic diversity and/or economic disparity. In general, the Region can be described as consisting of a mix of many different ethnicities and income levels.

On February 11, 2003, the Title VI review committee met with Richard Porth, CRCOG Executive Director, Thomas Maziarz, CRCOG Transportation Director, and Mario Marrero, CRCOG Transportation Planner. The committee discussed the incorporation of Title VI, Environmental Justice (EJ) and Limited English Proficiency (LEP) in the region's planning process and identified a number of items as positive directions the Region has taken.

- One of CRCOG's most significant accomplishments was the preparation of the EJ Action Plan and the dissemination of this plan to all MPOs throughout the State. This plan outlines efforts to better involve minority and low-income communities in the transportation planning process. The report also included locations of low-income and minority populations.
- Creation of an Environmental Justice Advisory Committee. The committee functions include advising CRCOG on outreach efforts, updating the EJ mailing list, and the review of, and participation in CRCOG's transportation plans and reports.
- The appointment of two members from the Environmental Justice Advisory Committee to the permanent Transportation Committee. This was a direct result of deliberations of the Environmental Justice Advisory Committee.
- Formation of Local Advisory Committees (LACs) as part of any major study that is undertaken. The LACs involve community representatives at each stage of a study.
- Preparation of selected transportation documents in both English and Spanish. One example of such a document is the jobs access program information document.
- Developed a community based relationship with the Puerto Rican Forum, which has led to translation of brochures and other documents into Spanish.

- Made a commitment to attending neighborhood group meetings to discuss transportation issues and programs. Group meeting include church organizations, neighborhood associations, and other social service agencies.
- Made concerted efforts toward reaching out to minority population in attempting to involve them in the planning process. Such efforts include the use of local Spanish targeted media.

While all the Regions need to examine the general guidelines for Title VI, EJ and LEP documented earlier in this report, there are a few items, which the review process identified as areas that CRCOG needs to commit resources and staff to in the coming year(s).

- Continue to analyze the distribution of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.
- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

Central Connecticut Regional Planning Agency

The Central Connecticut Regional Planning Agency (CCRPA) was established as the regional planning organization for the seven municipalities in Central Connecticut in 1966, and was designated as a Metropolitan Planning Organization in 1973. The board consists of a representative appointed by the mayor or first selectmen of each municipality and a representative appointed by the planning and zoning commission of each municipality.

The population of the Region is approximately 230,000. At the municipal level the Cities of New Britain and Bristol are the main municipalities, which demonstrate any substantial ethnic diversity or economic disparity. In general, the Region can be described as consisting of a mix of rural and suburban towns along with small cities that have significant minority populations.

The Title VI review committee met with Kenneth Shooshan-Stoller, Deputy Director and Joseph Barbeau, Transportation Planner on February 11, 2003. The committee discussed the incorporation of Title VI, EJ, and LEP in the Region's planning process and identified a number of positive steps the Region has taken.

- The preparation of bus maps in Polish and Spanish. This is done as part of the Region's outreach efforts.
- Environmental Justice is considered in the scoring of projects for the STP-Urban program.
- The CCRPA has used community newspapers to further its outreach efforts.
- The CCRPA plans to update the region's demographic profile in the next update of the Master Transportation Plan.

While all the Regions need to examine the general guidelines for Title VI, EJ, and LEP documented earlier in this report, there are a few items, which the review process identified as areas that the CCRPA needs to commit resources and staff to in the coming year(s).

- Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.
- Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Begin efforts to develop a Title VI/EJ Committee.
- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.
- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

Connecticut River Estuary Regional Planning Agency

The Connecticut River Estuary Regional Planning Agency (CRERPA) was established as the Regional Planning Agency for the Connecticut River Estuary region in 1967. However, it was not until 1968 that this area had full geographic representation of all nine towns. The Region's policy board consists of the Mayors and First Selectmen from the nine municipalities in the lower Connecticut River valley. The population of the Region is approximately 55,000. In general, the Region can be described as suburban.

The 2000 Census identified the Connecticut River Estuary Regional Planning Agency as an urban area and tied it to the New Haven Transportation Urban area. These changes resulted in the designation of the Connecticut River Estuary as an MPO on July 1, 2003, and the inclusion of this new MPO as part of the New Haven Transportation Management Area. In reviewing the Title VI initiatives in this Region it should be recognized that many of the activities, which have been undertaken in the past were appropriate for a rural planning region.

The Title VI review committee met with Linda Krause, Executive Director, Dorothy Papp, Planner and Jean Davis, Transportation Planner of the CRERPA on April 16, 2003. The committee discussed the incorporation of Title VI, EJ, and LEP in the Region's planning process and identified a number of items as positive directions the Region has taken.

- Production of a quarterly TV program on Clinton Comcast Channel 19. The show is hosted by one of the CRERPA's planners. The show discusses various issues, both transportation and otherwise, as they relate to the region.
- Beginning in 2003 the CRERPA began working on publishing a Spanish version of the Public Bus schedule, and providing a multi-lingual recording for bus schedules at the dispatcher.
- The CRERPA will be including an Environmental Justice component in its Unified Work Program, Long Range Transportation Plan and Transportation Improvement Program.

While all the Regions need to examine the general guidelines for Title VI, EJ, and LEP documented earlier in this report, there are a few items, which the review process identified as areas that the CRERPA needs to commit resources and staff to in the coming year(s).

- Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.
- Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Consider efforts to develop a Title VI/EJ Committee, or explore methods by which the relevant populations can be brought into the planning process.

- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.
- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

Council of Governments of the Central Naugatuck Valley

The Council of Governments of the Central Naugatuck Valley (COGCNV) was established as the Regional Planning Organization for the Central Naugatuck Valley in 1960 and has served as the Metropolitan Planning Organization for the Naugatuck Valley since 1983. The Council board consists of the Mayors and First Selectman of the thirteen municipalities in the greater Waterbury area. The population of the Region is approximately 275,000 . At the municipal level the Cities of Waterbury, Naugatuck and Cheshire are the main municipalities, which demonstrate substantial ethnic diversity or economic disparity. In general, the Region can be described as consisting of a large central city surrounded by suburban and rural towns.

The Title VI review committee met with Peter Dorpalen, Executive Director, Laurel Stegina, Transportation Planner and Alan Hachey, Transportation Planner of the COGCNV on March 4, 2003. The committee discussed the incorporation of Title VI, EJ, and LEP in the Region's planning process and identified a number of items as positive directions the Region has taken.

- Development and maintenance of a mailing list of interested and affected parties.
- Special attention paid to timing and location of meetings to coincide with bus transit services.
- The COGCNV regularly assesses the needs of low-income and minority populations, through the review of and recommended improvements to public transit service delivery, and participation in and planning for the Job Access and Reverse Commute Program, and Greater Waterbury Transit District Board meetings and activities.
- The COGCNV uses various media outlets in terms of its outreach efforts. One such outlet is the region's local cable access station. The COGCNV prepared a commercial, in both English and Spanish, explaining the Job Access and reverse commute program.
- The COGCNV uses a comment box at public information meetings. The box contains forms individuals may use to provide written comments. This provides a venue for individuals who may be reluctant to speak in public.
- The COGCNV has conducted a transit survey, which was available in both Spanish and English.

While all the Regions need to examine the general guidelines for Title VI, EJ, and LEP documented earlier in this report, there are a few items, which the review process identified as areas that the Council of Governments for the Central Naugatuck Valley needs to commit resources and staff to in the coming year(s).

- Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.
- Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Begin efforts to develop a Title VI/EJ Committee.
- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.
- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

Greater Bridgeport Regional Planning Agency

The Greater Bridgeport Regional Planning Agency (GBRPA) was created in 1960. In 1981 the Greater Bridgeport Regional Planning Agency and the Valley Regional Planning Agency were designated by the Governor as a Metropolitan Planning Organization.

The 2000 Census redefined the urban area boundaries for the Region, and created the new Bridgeport-Stamford Urbanized Area, and an expanded Transportation Management Area (TMA). The expanded TMA now includes the following regional planning organizations: Greater Bridgeport Regional Planning Agency, South Western Regional Planning Agency, and Valley Council of Governments.

The population of the Region is approximately 300,000. At the municipal level the Cities of Bridgeport and Stratford are the two municipalities that demonstrate any substantial ethnic diversity or economic disparity.

The Title VI review committee met with James Wang, Executive Director, and Mark Nielsen, Senior Transportation Planner of the GBRPA on June 9, 2003. The committee discussed the incorporation of Title VI, EJ, and LEP in the planning process and identified a number of positive steps the Region has taken.

- The GBRPA prepared a *Demographic Profile & Environmental Justice Evaluation* report based on 2000 Census block group data. Seven variables were analyzed to locate areas with minority and low-income populations, and identify those areas more dependent upon transit services. The seven variables included: minority population, low-income population, per capita income, poverty level, public assistance income, bus as a means of transportation to work, and households with zero vehicles. A block group was identified as an *at risk area* if its numerical value was twenty-five percent from the regional average.
- The GBRPA has extensive contacts with social service agencies, state and local representatives within the region, with respect to identifying the transportation needs of low-income and minority groups.
- The GBRPA has an extensive mailing list, which includes many neighborhood associations.
- The GBRPA makes direct contact with the affected neighborhoods, through neighborhood and listening sessions.
- The GBRPA sends notices of agency meetings to newspaper, radio, and television media, which includes a Spanish language newspaper and radio station

While all the Regions need to examine the general guidelines for Title VI, EJ, and LEP documented earlier in this report, there are a few items, which the review process identified as areas that the GBRPA the needs to commit resources and staff to in the coming year(s).

- Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Begin efforts to develop a Title VI/EJ Committee.
- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.
- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Consider alternative techniques other than newspapers to get out information regarding meetings.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

Housatonic Valley Council of Elected Officials

The Housatonic Valley Council of Elected Officials was established as the Regional Planning Agency for the Housatonic Valley in 1968 and has served as the Metropolitan Planning Organization for the Housatonic Valley since 1975. The Region's policy board consists of the Chief Elected Officials for the ten municipalities in the greater Danbury area. The population of the Region is approximately 200,000. At the municipal level the City of Danbury is the only municipality, which demonstrates any substantial ethnic diversity or economic disparity. In general, the Region can be described as suburban.

The Title VI review committee met with Jonathan Chew and Andrew Carrier of the HVCEO on March 4, 2003. The committee discussed the incorporation of Title VI, EJ, and LEP in the Region's planning process and identified a number of items as positive directions the Region has taken.

- Development of a special mailing list of minority organizations and institutions serving low-income populations.
- Beginning in 2003 all TIP and Long Range Plan drafts will be sent to minority targeted organizations and institutions for comment.
- Innovative database developed for Danbury that identifies projects by geographic location. This tool allows the public as well as policy makers to identify projects, which may impact Title VI communities.

The Region has developed a "Transportation Road Show", a slide-show (plans to convert to powerpoint in the near future), which describes the Regions transportation program. The staff of the HVCEO has presented this "Show" at the meetings of various civic organizations. This is a very effective way to provide information regarding transportation planning to a wider audience than would be expected at the Regional Council's standard meetings.

While all the Regions need to examine the general guidelines for Title VI, EJ, and LEP documented earlier in this report, there are a few items, which the review process identified as areas that the HVCEO needs to commit resources and staff to in the coming year(s).

- Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.
- Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Consider efforts to develop a Title VI/EJ Committee, or explore methods by which the relevant populations can be brought into the planning process.
- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.

- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Consider media options other than newspapers to disseminate information regarding meetings.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

Midstate Regional Planning Agency

The Midstate Regional Planning Agency (MRPA) was organized in 1962 after four of the seven municipalities voted to join the Region. By 1965 all eight municipalities were members. The Region was redefined in 1967 and included East Haddam, which joined the same year. The board consists of representatives who are appointed by the mayors, first selectmen, and appointees from the planning and zoning commissions.

The population of the Region is approximately 104,500. At the municipal level the City of Middletown is the main municipality that demonstrates any substantial ethnic diversity or economic disparity. In general, the Region can be described as consisting of combined racial minorities of about 11.1% percent of the region's population. The predominant minority group in the Midstate Region are African Americans at 6.2%. The low-income population comprises of 5.1% of the Region.

The Title VI review committee met with Geoffrey Colegrove, Executive Director, and Robert Haramut Jr., Transportation Planner on April 16, 2003. The committee discussed the incorporation of Title VI, EJ, and LEP in the Region's planning process and identified a number of positive steps the Region has taken.

- Development of a detailed analysis on a block group basis of the region's eight towns. The MRPA has prepared two sets of maps. One shows the percent of the specific population group greater than the regional average. The other map shows the percent of a specific population group in five evenly distributed categories using the lowest number as a baseline.
- The MRPA has expanded its mailing list to include churches, social service organizations and neighborhood organizations which receives copies of TIP updates and other reports.
- MRPA staff has attended neighborhood organization meetings with respect to neighborhood specific issues, such as the North End Action Center.
- The MRPA does extensive work in handling public comments with respect to MRPA reports. Public comments are included as appendices in each affected report. The MRPA also produces a summary and analysis report of the disposition of comments received at public meetings and during comment periods.
- The MRPA has also developed an STP Urban application process which gives credits to projects in EJ targeted communities.

While all the Regions need to examine the general guidelines for Title VI, EJ, and LEP documented earlier in this report, there are a few items, which the review process identified as areas that the MRPA needs to commit resources and staff to in the coming year(s).

- Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Consider efforts to develop a Title VI/EJ Committee, or explore methods by which the relevant populations can be brought into the planning process.

- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.
- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

South Central Regional Council of Governments

The South Central Regional Council of Governments is organized per Section 4-124i of the Connecticut General Statutes and was designated by the Governor as the Metropolitan Planning Organization for this Region on January 23, 1985. The Regional Policy Board serves as the board for the MPO. The Regional Transportation Committee is made up of Chief Elected Officials, appointed by the Council on an annual basis and the Transportation Technical Committee, consists of one municipal staff member from each municipality, appointed by the Chief Elected Official. Representatives of CT Transit, the Greater New Haven Transit District, and the Milford Transit District participate as non-voting members of these committees. The South Central Region is also part of the larger New Haven Transportation Management Area, which includes the Connecticut River Estuary Regional Planning Agency.

The South Central Region has a total population of 546,838 (2000 Census), which is ethnically and economically diverse. The Region consists of fifteen municipalities in the greater New Haven area. All the municipalities are located on or near the I-91 and I-95 corridors.

The Title VI review committee met with Judy Gott, Executive Director and Herbert Burstein, Deputy Director of the SCRCOG on June 9, 2003. The committee discussed the incorporation of Title VI, EJ, and LEP in the Region's planning process. A number of items were identified as positive directions the Region has taken in this regard.

- Development of demographic profile of the Region using the 2000 Census and GIS mapping.
- First draft of an EJ Guidelines document.
- Multi-faceted look at the needs of all population groups in the Region via a Housing Needs Study and a Jobs Access Study.
- Positive directions toward developing an EJ Steering Committee, have met with members of the Connecticut EJ Coalition.
- Utilization of local radio talk shows to discuss major transportation issues and use of cable access by municipal Chief Elected Officials to disseminate information.

The Region has demonstrated a commitment to developing a meaningful EJ process that will provide access to the planning process for all members of the community. In 2001 the Region attempted to reach out to the EJ communities and develop a committee to review the Region's overall planning process. While the initial outreach effort was not successful, the staff has since reexamined the outreach efforts and is now trying new avenues, such as working with the Connecticut EJ Coalition. They have been able to identify neighborhood groups that are interested in this process through their work with the Housing and Jobs Access studies.

While all the Regions need to examine the general guidelines for Title VI, EJ, and LEP documented earlier in this report, there are a few items, which the review process

identified as areas that the South Central Region needs to commit resources and staff to in the coming year(s).

- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.
- Provide the Region's pamphlet on "What is the TIP?", in alternative language as appropriate for the Region.
- Develop a pamphlet on the Long Range Plan process, similar to the "What is the TIP?", and provide it in alternative languages as well.
- Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.
- Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Continue efforts to develop a Title VI/EJ Committee.
- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

Southeastern Connecticut Council of Governments

The Southeastern Regional Planning Agency was designated by the Governor as the Metropolitan Planning Organization for transportation planning in the Southeastern Connecticut Planning Region in 1973. The role of the MPO was officially transferred from the Regional Planning Agency to the Southeastern Connecticut Council of Governments (SCCOG) when the agency was reorganized in 1993. The Region's policy board consists of the Chief Elected Officials of the twenty municipalities in the southeast corner of Connecticut.

The population of the Region is approximately 243,000, according to the 2000 Census, and about 42% of the Region's population resides within the cities of Groton, New London and Norwich. There are major per capita income disparities between the cities and the suburban towns, which ranged from a high of \$69,000 in Salem to a low of \$34,000 in New London. The cities also demonstrate more diversity than their suburban counterparts.

The Region is home to two federally recognized sovereign Native American tribes, the Mashantucket Pequot Tribal Nation and the Mohegan Tribe. Both tribes operate casinos, and are the major employers in the region. The tribal nations, the US Coast Guard Academy, and the US Naval Sub Base are non-voting affiliate members of the COG.

The Title VI review committee met with James Butler, Executive Director and Richard Guggenheim, Assistant Director of the SCCOG on May 15, 2003. The committee discussed the incorporation of Title VI, EJ, and LEP in the Region's planning process and identified a number of positive steps the Region has taken.

- Multi-faceted look at the needs of the Region via an Analysis of Housing Needs study.
- Good working relationship with Centro de la Comunidad and the Thames Valley Council for Community Action, social service organizations that provide support to EJ communities.
- The Region has developed a Social Indicators report using the 2000 Census.
- Subsequent to the review, SCCOG staff has indicated that it will recommend to the COG that it should add a "public comment" item to its meeting agenda as recommended by the Title VI review committee.

While all the Regions need to examine the general guidelines for Title VI, EJ, and LEP documented earlier in this report, there are a few items, which the review process identified as areas that the Southeastern Connecticut Council of Governments needs to commit resources and staff to in the coming year(s).

- Update the COG meeting agenda to provide opportunity for public comment and input. Currently the agenda for the COG meeting does not provide the opportunity for public comment.

- Consider alternative techniques other than newspapers to get out information regarding meetings.
- Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.
- Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Begin efforts to develop a Title VI/EJ Committee.
- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.
- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

South Western Regional Planning Agency

The Governor designated the South Western Region Metropolitan Planning Organization in 1981. The Region's policy board consists of the Directors of the Stamford, Norwalk and Westport Transit Districts, and the Chief Elected Officials of the eight municipalities in the southwestern corner of Connecticut. The Chief Elected Officials each have one full vote on the MPO, whereas the three transit districts share one vote. The Transportation Technical Advisory Group is a committee, which consists of professional staff from SWRPA, the three Transit Districts, Municipal Planning, Engineering and Traffic Engineering Departments. The committee reviews and evaluates proposals and submits recommendations to the MPO.

The South Western Region was incorporated into the expanded Bridgeport-Stamford Urbanized Area, and was designated as a Transportation Management Area as a result of the 2000 Census. The population of the Region is approximately 354,000, and the majority of the EJ populations reside in the Cities of Norwalk and Stamford. Those municipalities are the only communities in the Region, which demonstrate any substantial ethnic diversity or economic disparity.

The Title VI review committee met with Robert Wilson, Executive Director and Susan Prosi, Senior Transportation Planner of the SWRPA on May 22, 2003. The committee discussed the incorporation of Title VI, EJ, and LEP in the Region's planning process and identified a number of positive steps the Region has taken.

- Development of demographic profile of the Region using the 1990 Census and GIS mapping. SWRPA prepared a *Draft Environmental Justice Assessment Report* in 2002, and analyzed six demographic variables: Minority Population, Per capita income, Persons below the poverty level, Households with Public Assistance Income, Bus as a means of transportation to work, and Households with zero vehicles available. For each of the six variables, a regional average was calculated by Census tract. If a Census tract had an average that exceeded twenty-five percent of the regional average, it was identified as a *Community of Concern*. The analysis is being updated with the 2000 Census data.
- Positive steps in the examination of the distribution of benefits and burdens of transportation investments in the TIP. SWRPA plans to geo-locate all FY2004-2006 TIP projects, and assess the locations against the EJ demographic analysis.
- Positive steps towards developing an EJ Steering Committee. SWRPA has met with faith based organizations and neighborhood groups which provide support to EJ communities.

While all the Regions need to examine the general guidelines for Title VI, EJ, and LEP documented earlier in this report, there are a few items, which the review process identified as areas that the South Western Regional Planning Agency needs to commit resources and staff to in the coming year(s).

- Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.
- Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Begin efforts to develop a Title VI/EJ Committee.
- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.
- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Consider alternative techniques other than newspapers and mailings to get out information regarding meetings.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

Valley Council of Governments

The Valley Regional Planning Agency was created in 1966. In 1981 the Valley Regional Planning Agency and the Greater Bridgeport Regional Planning Agency were designated by the Governor as a Metropolitan Planning Organization. As of July 1, 2002, the Valley Regional Planning Agency (VRPA) assigned all its rights and responsibilities to the Valley Council of Governments (VCOG). The VCOG assumed all the obligations of the VRPA, including coordination of planning activities and regional transportation support services.

The 2000 Census redefined the urban area boundaries for the Region, and created the new Bridgeport-Stamford Urbanized Area, and an expanded Transportation Management Area (TMA). The expanded TMA now includes the following regional planning organizations: South Western Regional Planning Agency, Valley Council of Governments and Greater Bridgeport Regional Planning Agency. The membership of the VCOG is governed by the Chief Elected Officials of the four participating municipalities, which include Ansonia, Derby, Seymour and Shelton.

The population of the Region is 84,500 according to the 2000 Census, and 45% of the Region's population resides within the city of Shelton. The household incomes range from a low of \$21,783 in Ansonia, to a high of \$35,643 in Shelton. The towns of Ansonia and Derby demonstrate more ethnic diversity than Seymour or Shelton.

The Title VI review committee met with Richard Eigen, Executive Director and Kevin O'Mara, Senior Transportation Planner of the VCOG on May 8, 2003. The committee discussed the incorporation of Title VI, EJ, and LEP in the Region's planning process and identified a number of positive steps the Region has taken.

- Development of demographic profile of the Region using the 1990 Census. As part of the Region's Transportation Plan development in 2001, seven demographic variables were analyzed for the purpose of identifying minority and low-income populations, and locating areas of transit dependency. The seven variables included: Minority population, Per capita income, Persons below the poverty level, Households with Public Assistance Income, Bus as a means of transportation to work, Number of Household vehicles and Number of Households with zero vehicles available. For each of the seven variables, a regional average or *Reference Community* was calculated by Census Tract. If a Census tract had an average that exceeded twenty-five percent of the regional average, it was identified as a *Community of Concern*. The analysis is being updated with the 2000 Census data.
- Good working relationship with the Community Foundation for Greater New Haven and its Valley Advisory Committee, an organization that provides support to EJ communities. VCOG's staff also participates on the transportation committee of the Valley Advisory Committee.
- The Region has also participated on the transportation committee of the Valley Chamber of Commerce on Access to Job initiatives.

While all the Regions need to examine the general guidelines for Title VI, EJ, and LEP documented earlier in this report, there are a few items, which the review process identified as areas that the Valley Council of Governments needs to commit resources and staff to in the coming year(s).

- Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.
- Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.
- Begin efforts to develop a Title VI/EJ Committee.
- Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.
- Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)
- Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.
- Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

VII. Best Practices Identified in the Metropolitan Planning Organizations

Below are some best practices identified during the interviews.

- The formation of an EJ Advisory Committee and the inclusion of two members of this committee on the transportation committee.
- Outreach to community organizations via attendance at neighborhood meetings.
- Detailed demographic analysis of the municipalities at the block group level.
- Use of community newspapers and media to inform the public.
- An STP-Urban selection process that includes the awarding of credits for projects in EJ targeted communities.

VIII. A Quick Look at the Rural Planning Regions

The committee held meetings with the four rural planning regions to discuss the Title VI compliance. Unlike the MPOs the ConnDOT is responsible for a large portion of Title VI compliance in the rural regions of the State. A great deal of this work is done in a cooperative manner between the ConnDOT and the Rural Regions. Each region does produce a Long Range Transportation Plan and hold public meetings and forums and thus must meet Title VI requirements in these areas.

In general all four rural regions appear to have comprehensive outreach programs. In small rural areas close interaction with municipal officials allows for a strong contact with the entire community.

Litchfield Hills Council of Elected Officials and the Northwestern Connecticut Council of Governments

The northwestern corner of Connecticut contains two rural regional planning organizations.

The Northwestern Connecticut Council of Governments' membership includes Canaan, Cornwall, Kent, North Canaan, Roxbury, Salisbury, Sharon, Warren, and Washington. The Region is homogeneous in its ethnicity and income level. The area is primarily Caucasian and well above the poverty level.

The Litchfield Hills Council of Elected Officials includes Barkhamsted, Colebrook, Goshen, Hartland, Harwinton, Litchfield, Morris, New Hartford, Norfolk, Torrington, and Winchester. The town of Torrington is the most intensively developed community in the Region and contains the only true ethnic and economic diversity in the Region. The rest of the Region, like the Northwestern Region is primarily Caucasian and above the poverty level.

The main emphasis of Title VI activities within these regions has centered on the provision of transit services along major corridors. Overall the Regions do seem to be attempting to reach what little target communities exist within the two regions and provide them with transit options especially in the area of access to jobs. The Regions do need to reexamine their activities with regard to the guidance items listed earlier in this report and evaluate where improvements if any need to be implemented.

Northeastern Connecticut Council of Governments and the Windham Region Council of Governments

The northeastern corner of Connecticut also contains two rural planning regions; the Northeastern Connecticut Council of Governments and the Windham Region Council of Governments. These two regions unlike the regions in the northwestern corner of the State do have a great deal of diversity in both ethnicity and economic level. However,

similar to the northwest corner most of the activity in the Title VI area has been centered on transit.

Both of these regions provide demographic profiles for their regions which should be reexamined to determine if the target communities can be better defined (i.e., consider looking at demographics at the Block Group Level not the municipal level).

The Northeastern Connecticut Council of Governments consists of the towns of Brooklyn, Canterbury, Eastford, Killingly, Plainfield, Pomfret, Putnam, Sterling, Thompson, Union and Woodstock. Income levels in this Region are below those for the rest of the State, with six towns ranking in the bottom twenty for income. The staff of the Region is also staff to the local transit district. The staff effectively interacts with a variety of human service agencies within the Region as part of its outreach to low-income and minority populations.

The Windham Council of Governments centered on the City of Windham includes Ashford, Chaplin, Columbia, Coventry, Hampton, Lebanon, Mansfield, and Scotland. The entire Region is below the Statewide median income and Mansfield and Windham have the highest percentage of minority population. The staff frequently assesses the public participation and modifies the outreach as a result of this effort. Bus schedules are available in both English and Spanish.

Both regions in the northeast corner of the State have updated or are in the process of updating their demographic profiles with 2000 Census data at the Block Group Level.

Again the Regions do need to reexamine their activities with regard to the guidance items listed earlier in this report and evaluate where improvements if any need to be implemented.

IX. Next Steps

ConnDOT, FHWA, and FTA will continue to monitor implementation of Title VI activities by the RPOs. It is the responsibility of ConnDOT to assure that all Title VI requirements are met and that the MPOs are cognizant of these requirements. ConnDOT should have an established procedure for assuring compliance and maintain records of MPO compliance to be available for federal review.

The MPOs will emphasize/reemphasize Title VI (and incorporate EJ and LEP efforts/initiatives into the Title VI section) as a task item in their UPWPs and document updates in their quarterly reports.

FHWA and FTA will monitor the progress of Title VI and Environmental Justice (EJ), the Title VI requirements will be reviewed as part of the Triennial Certification Review process in the TMAs. It will be reviewed annually as part of the FHWA/FTA planning finding, and on a periodic basis for all MPOs and Rural Regions (annual planning certification) which are not part of a TMA.