

Norwalk Transit District Title VI Program Update

Submitted June 1, 2022

Old Plan expires July 31, 2022

New Plan expires July 31, 2025

Prepared by Norwalk Transit District 275 Wilson Ave Norwalk, CT 06854 www.norwalktransit.com



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INTRODUCTION

The Norwalk Transit District (NTD) has updated its Title VI Program as required by the Federal Transit Administration (FTA) and to ensure that the level and quality of the Norwalk Transit District's fixed-route and demand-response services are provided pursuant to Title VI of the Civil Rights Act of 1964. That is:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. 2000d)

The Norwalk Transit District, as a recipient of federal financial assistance, will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended and related statutes and regulations in all Norwalk Transit District programs and activities. The Norwalk Transit District provides, without regard to race, color, or national origin:

- 1. Transit services and benefits that are available and equitably distributed.
- 2. A level and quality of transit services that are sufficient to provide equal access and mobility for all persons.
- 3. Opportunities to participate in the transit planning and decision-making processes; and,
- 4. Fair decisions on the location of transit services and facilities.

These objectives are the basis for the Norwalk Transit District's Title VI program.

The program that follows was updated in conformance with FTA C 4702.1B (October 1, 2012). The guidance in this circular integrates the responsibilities to Limited English Proficient (LEP) Persons into the programs and activities developed under the Title VI regulations (49 CFR Part 21) to recipients of federal financial assistance.

This program contains all elements required of a transit provider operating in an urbanized area of 200,000 or more in population and operating less than fifty vehicles in peak service. It supersedes the Norwalk Transit District's Title VI Program of 2019 and is effective as of August 1, 2022. It has been prepared using data from the U.S. Census 2015-2019 American Community 5-Year survey, report C16001: "Language Spoken at Home".

GENERAL REQUIREMENTS

Annual Title VI Certifications and Assurances

The Norwalk Transit District submits its annual Certifications and Assurances to the Federal Transit Administration each year in accordance with the requirement to do so within 90 days from the date of the publication of the notice in the Federal Register or with the first grant application, whichever comes first. The most recent submission was on May 8th, 2022. The CEO was delayed several days with the submittal this year due to hospitalization. She additionally worked with FTA to ensure that NTD legal counsel would be able to pin these documents going forward as recommended by FTA. Legal counsel is approved, and updated Certifications and Assurances will be submitted each year.

Notification of Beneficiaries of Protection Under Title VI

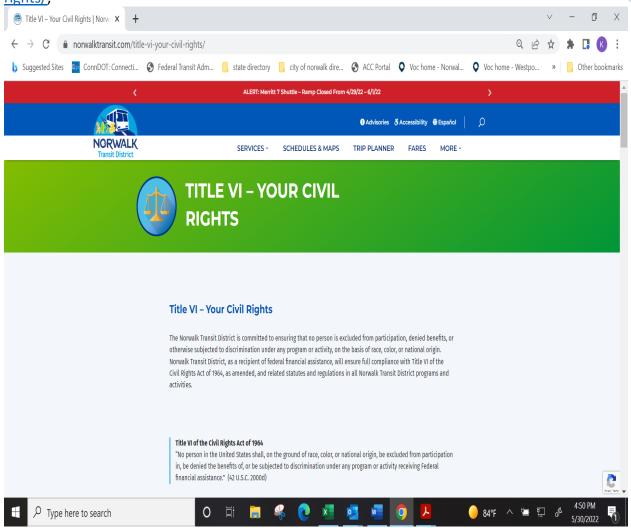
In compliance with 49 CFR Section 12.9 (d), the Norwalk Transit District has provided information to the public regarding its Title VI obligations and apprises members of the public of the protection against discrimination afforded to them by Title VI on an on-going basis.

This statement of nondiscrimination on the basis of race, color, and national origin is made available on / at:

• the main upper reception / lobby of Norwalk Transit District,



• the Norwalk Transit District's website https://norwalktransit.com/title-vi-your-civil-rights/



• on bus rail cards in all Transit District vehicles.

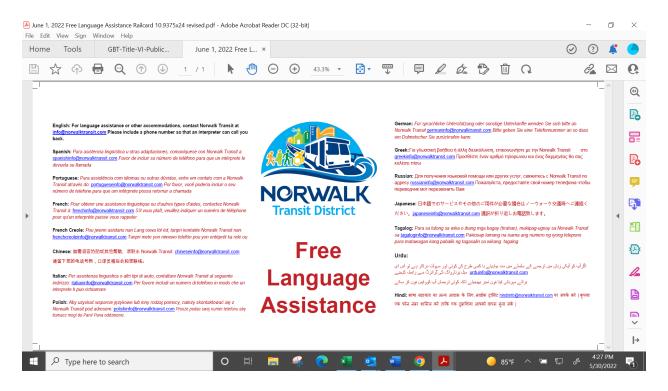




All rail cards are accompanied by the attached language assistance rail card.



June 1, 2022 Free Language Assistance I



The Title VI notice includes contact information for requesting details on the Norwalk Transit District's Title VI obligations and the complaint procedure. The dissemination of Title VI notifications in both English and Spanish began in 2010. Since the installation of the ITS system

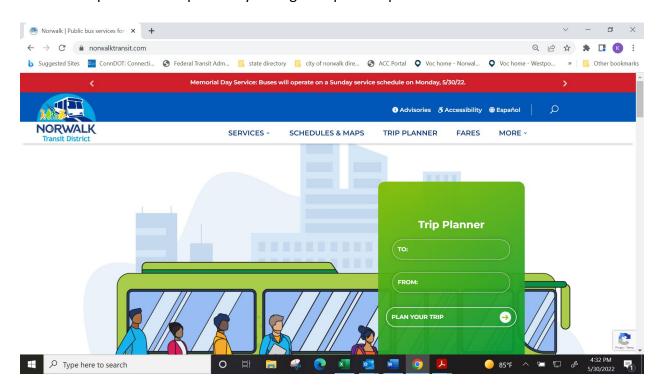
in 2017, the District no longer pre-prints schedules or Title VI brochures. Information regarding Title VI and bus information is primarily offered through the new AVL MyStop technology and on our website. On request the District will print all referenced materials and will deliver via direct US mail.

Your Civil Rights

In accordance with Title VI of the Civil Rights Act of 1964, the Norwalk Transit District (NTD) operates its services without regard to race, color, and national origin. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with NTD.

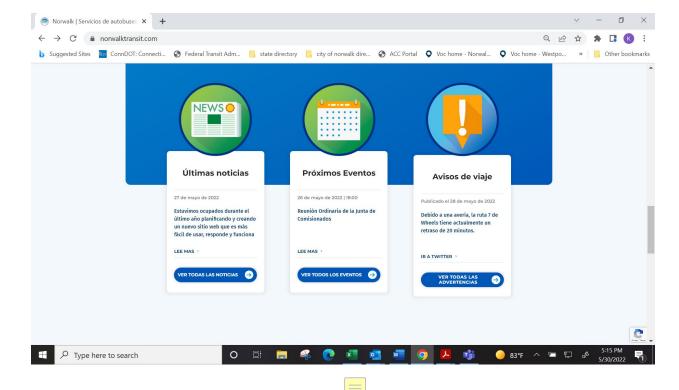
For more information on NTD's obligations under Title VI or the procedures to file a complaint, contact the Norwalk Transit District's Civil Rights Officer at (203) 852-0000 or visit the NTD Office located at 275 Wilson Ave, Norwalk, CT 06854.

On May 26, 2022, the Norwalk Transit District soft launched a new website. This is a work in progress. We continue to update sections to ensure the best customer service experience. The website makes available Spanish translation with the click of one button. Please see the website snapshot below specifically noting the Spanish option on the blue ribbon.



The following represents a sample of Spanish translated services from our website.





Provision of Additional Information to the FTA

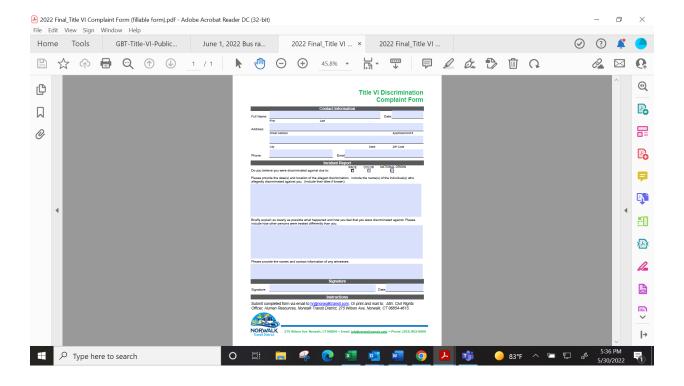
The Norwalk Transit District will provide the Federal Transit Administration (FTA) additional information upon request. Such information may be related to, but not limited to, investigation

of complaints of discrimination or to resolve concerns about possible noncompliance with Title VI. The Norwalk Transit District will submit an updated Title VI Program to the FTA's regional civil rights officer once every three (3) years.

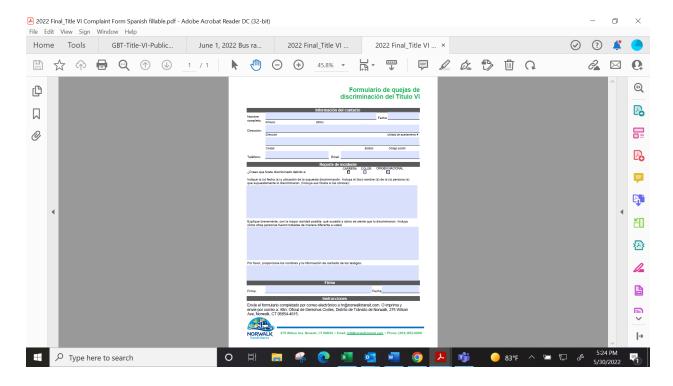
Discrimination Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Norwalk Transit District may file a discrimination complaint. To file a complaint with the Norwalk Transit District, complete and submit the Norwalk Transit District Title VI Discrimination Complaint Form. Complaint forms are made available online. Please see direct links below and snapshots for content as it appears on the website. Forms are available upon request at the Norwalk Transit District administrative office located at 275 Wilson Ave, Norwalk, CT 06854.

ENGLISH: https://norwalktransit.com/wp-content/uploads/2023/04/NTD-Title-VI-Complaint-Form-Fillable.pdf



SPANISH: https://norwalktransit.com/wp-content/uploads/2023/04/NTD-Title-VI-Complaint-Form-Fillable Spanish.pdf



File a Complaint

Any person who believes that he or she has been subjected to discrimination or retaliation based on race, color or national origin may file a Title VI complaint. Complaints may be filed directly with Norwalk Transit or to the Federal Transit Administration. Complaints must be filed in writing and signed by the complainant or a representative and should include the complainant's name, address, and telephone number or other means but which the complainant can be contacted. Complaints must be filed within six months of the date of the alleged discriminatory act.

To request additional information on Norwalk Transit District's non-discrimination obligations or to file a Title VI complaint, please submit your request or complaint in writing to:

ATTN: Civil Rights Officer Norwalk Transit District

275 Wilson Avenue

Norwalk, Connecticut 06854-4615

Telephone: 203-852-0000

Fax: 203-299-5166

E-mail: titlevi@norwalktransit.com

Federal Transit Administration Title VI complaints may be sent to:

Attn: Office of Civil Rights
Federal Transit Administration
1200 New Jersey Avenue SE
Washington, DC 20590

What is Title VI?

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

Title VI Policy

Pursuant to Title VI of the Civil Rights Act of 1964, the Restoration Act of 1987 and other nondiscrimination authorities, it is the policy of the Norwalk Transit District that discrimination on the ground of race, color, or national origin shall not occur in connection with programs or activities receiving financial assistance from the USDOT.

Norwalk Transit District will ensure 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 otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the USDOT.

Title VI Compliance

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

USDOT Recipient

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

Programs Covered

Federally assisted programs include any USDOT Project, program or activity for the provision of services, financial aid, and other benefits. This includes education or training, work opportunities, health, welfare, rehabilitation, housing, or other services, whether provided directly by the recipient or other agents, through contracts or other arrangements with the recipient.

What discrimination is prohibited by the Norwalk Transit District's Title VI Program?

Discrimination under our Title VI program is an act (action or inaction) whether intentional or unintentional, through which a person believes that he or she, individually, or as a member of any specific class of persons, has been excluded from participation in, been denied the benefits of, or been subjected to discrimination on the basis of race, color, or national origin, under any program or activity receiving financial assistance from USDOT, with regard to:

- the availability and equitable distribution of transit services and benefits;
- the level and quality of transit services that are sufficient to provide equal access and mobility for all persons;
- the opportunity to participate in the transit planning and decision-making processes;
 and;
- the right to fair decisions on the location of transit services and facilities.

Who may file a Title VI complaint?

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

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

Title VI Complaint Procedure

The complaint will be made in writing, using the complaint form, and submitted to the Norwalk Transit District Civil Rights Officer and will include all information relevant to a determination of discrimination. A complaint must be filed within six (6) months after the alleged discrimination. In cases where the complainant is unable or incapable of providing a written statement, the Civil Rights Officer will, if necessary, assist the person in converting verbal complaints to writing and will interview the complainant. The complainant or his/her representative will sign all complaints.

The complete complaint procedure/process is available upon request by calling 203-852-0000. Provision will be made for persons with limited English proficiency.

What information do I include in my complaint?

Follow the outline provided on the complaint form, including:

- Your name, address, and telephone number. If you are filing on behalf of another person, include their name, address, telephone number and your relation to that person.
- The name and address of the agency, firm, or department you believe discriminated against you.

- Your signature.
- A description of how, why, and when you believe you were discriminated against. Include as much background information as possible about the alleged acts.
- The names of individuals whom you allege discriminated against you if you know them.
- The names of any persons, if known, that can be contacted for additional information to support or clarify your allegations.

Complaint forms should be filed immediately. However, the Norwalk Transit District will investigate complaints received no more than 180 calendar days after the alleged discrimination. Complaints will be made in writing to the Norwalk Transit District and include all information relevant to a determination of discrimination.

In cases where the complainant is unable or incapable of providing a written statement, the Norwalk Transit District will assist in converting verbal complaints to writing. The complainant or his/her representative will sign all complaint forms.

Once the complaint is received, the Norwalk Transit District Title VI Coordinator will review it and the complainant will receive an acknowledgement letter informing whether the complaint will be investigated by the Transit District. If the Norwalk Transit District finds that discrimination did not occur, the complainant will be notified and advised of the right to submit a complaint to the Federal Transit Administration for further investigation.

If discrimination may have occurred, the Norwalk Transit District has thirty (30) calendar days to investigate the complaint(s).

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between affected parties and the Title VI Officer may be utilized for resolution at any stage of the process.

If additional information is needed to resolve the case, the Norwalk Transit District may contact the complainant. The complainant has thirty (30) calendar days from the date of outreach to send requested information to the Transit District. If the requested additional information or a response from the complainant is not received within thirty (30) calendar days, the Norwalk Transit District can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue the case.

After a thorough investigation of the complaint, the Norwalk Transit District Title VI Officer will make a determination of discrimination. The Transit District will issue one of two letters to the complainant: (1) a closure letter, or (2) 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, or other remedial actions will occur.

The complainant may appeal the decision within thirty (30) calendar days of the post-mark of the determination letter by submitting a written request for an appeal hearing to the Chief Executive Officer.

ATTN: Chief Executive Officer Norwalk Transit District 275 Wilson Avenue Norwalk, Connecticut 06854-4615 Telephone: 203-852-0000

Fax: 203-299-5166

E-mail: titlevi@norwalktransit.com

Recording Title VI Investigations, Complaints & Lawsuits

To comply with 49 CFR Section 12.9 (b) The Norwalk Transit District will prepare and maintain a list of any active investigations conducted by The Norwalk Transit District or any other entities other than the FTA, lawsuits, or complaints naming The Norwalk Transit District and/or its subcontractor(s) that allege discrimination on the basis of race, color, or national origin.

This list will include:

- the date the investigation, lawsuit, or complaint was filed;
- a summary of the allegation(s);
- the status of the investigation, lawsuit, or complaint; and
- actions taken by The Norwalk Transit District or subcontractor in response to the investigation, lawsuit, or complaint.

The Norwalk Transit District currently has no open complaints, investigations or lawsuits alleging discrimination on the basis of race, color, or national origin. Nor has it received any Title VI complaints in the previous review period.

Active Lawsuits, Complaints, or Inquiries Alleging Discrimination

recive Lawsuits, complaints, or inquires rineging Discrimination									
Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken					
There are no current or									
pending lawsuits,									
complaints, or inquiries.									

PUBLIC PARTICIPATION

The Norwalk Transit District's public participation plan offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. The strategies of the public participation plan are used to encourage and guide public involvement efforts and to enhance access to NTD's transportation decision-making for minority, low-income and Limited English Proficiency (LEP) populations.

The NTD's ongoing public participation plan ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health and ability to participate in life activities;
- Contribution from the public can and will influence NTD's decision-making;
- Concerns of all persons and groups involved will be considered in the decisionmaking process; and
- NTD will seek out and facilitate the involvement of those potentially affected.

The Norwalk Transit District uses a variety of communication mechanisms to ensure that all populations, including those residing in minority census tract, persons with low-income, persons with disabilities, and persons with limited English proficiency have an opportunity to participate in service development and changes to service delivery.

Opportunities for Public Participation

Service and Fare Changes

The following examples list when the public participation plan will be applied to fare and service changes. These instances would result in the public participation process.

- Modifications that impact a route
- New or revised fare media, policy or change in fare collection method and pricing
- Route is proposed for elimination
- Frequency of service is modified such as proposed change to days/hours of service

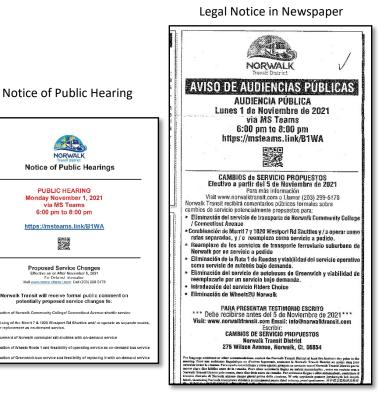
Minor adjustments to a schedule or route would be posted thirty days in advance of any change.

The last fixed route service change to involve the public participation process occurred on November 1st, 2021. The proposals included route changes, possible fare type eliminations,

possible route eliminations and announcements of new on-demand transit services. Route eliminations had already occurred during the pandemic lock down period prior to this public participation process. This outreach effort was to determine if the route should remain eliminated based on pre-covid ridership and public input. Strategies to invite public participation included the posting of notices on buses, through print and social media and on the Norwalk Transit website. Due to the ongoing pandemic, a virtual public hearing was held to discuss and receive testimony on proposed service changes, possible fare type elimination and announcement of new on-demand services. The event was held on November 1st, 2021, at 6:00 pm and gave the public the opportunity to review and suggest changes/ modifications. Written public comments were allowed to be submitted via email or by mail for additional five days after the public hearing.

The public was notified of the proposed changes and opportunities for comment through the following efforts:

- Notice of the intent to change fixed route services and fare media type published on the website in both English and Spanish on September 22, 2021
- Legal notice published in local newspaper in English on October 4th, 2021, and in Spanish on September 30th, 2021
- Notice of public hearing onboard vehicles as posters in both English and Spanish
- Notice of public hearing as seat drop fliers in both English and Spanish



NORWALK

Notice of Public Hearings

PUBLIC HEARING ay November 1, 2021 via MS Teams

https://msteams.link/B1WA

Proposed Service Changes Effective on or After November 5, 2021 For Detailed Information latt vovemonys class Loom, Call (803) 259-5178

ón Del Comité Asesor De I 旅客咨询委员会会议

Notice on Website





Notice of Public Hearings

PUBLIC HEARING Monday November 1, 2021 via MS Teams 6:00 pm to 8:00 pm

https://tinyurl.com/7d4wfjuc



Proposed Service Changes Effective on or After November 5, 2021

For Detailed Information
Visit <u>www.norwaiktransit.com</u>. Call (203) 299-5178

Norwalk Transit will receive formal public comment on potentially proposed service changes to:

Elimination of Norwalk Community College/ Connecticut Avenue shuttle service

Combining of the Merrit 7 & 1020 Westport Rd Shuttles and/ or operate as separate routes, and/or replacement as on-demand service.

Replacement of Norwalk commuter rall shuttles with on-demand service

Elimination of Wheels Route 1 and feasibility of operating service as on-demand bus service

Elimination of Greenwich bus service and feasibility of replacing it with on-demand service

Introduction of Riders Choice service

Elimination of Wheels2U Norwalk

Elimination of UniTicket as fare payment for NTD

To Submit Written Testimony
Must be received by November 5, 2021

Visit: www.norwalktransit.com Email: info@norwalktransit.com

Write: Proposed Service Changes Norwalk Transit District 275 Wilson Avenue, Norwalk, Ct. 06854 Notice of Public Hearing for Wheels 2U fare increase conducted on April 9, 2020.



HOME SERVICES FARES ANNOUNCEMENTS CONTACT



Notice Of Public Hearing

Proposed Fare/Service Changes for Wheels2U Service Effective As Of April 9, 2020

For Detailed Information:

Visit www.norwalktransit.com or Call (203) 299- 5164

Norwalk Transit will receive formal public comment on:

*Wheels2U (On-Demand) fare changes to \$2.00

[Note: Shared rides of more than 3 people will not exceed \$6.00] *Service Increase of hours, service zone and number of vehicles

PUBLIC HEARING

Thursday April 2, 2020 Norwalk Transit, Driver's Lounge

14 B Belden Avenue, (Opposite the Wheels HUB)

Norwalk, Ct. 06850

6:00 pm to 8:00 pm

To Submit Written Testimony

Must be received by April 3, 2020

Visit: www.norwalktransit.com or e-mail: info@norwalktransit.com

Write: Wheels2U Fare & Service Changes

Write: Wheels ZU Fare & Service Changes
Norwalk Transit District, 275 Wilson Avenue, Norwalk, Ct. 06854
For language assistance or other accommodations, contact the Norwalk Transit District at least five business day prior to the meeting. Pour une assistance linguistique ou d'autres logements, contacter le Norwalk Transit District au moins cins jour ouvrable avant la revinio. Para yeuke care alleium, sort qui que can failons you requi quitce, pioque ace entanteto con d'Avevalk Transit District por lo menos cinco dina hibilità sante de la remaina. Para obter antistetada lingua eu outrus acomodações, entre em contact con la remaina de la remaina. Para obter antistetada lingua eu outrus acomodações, entre em contact con la remaina de la

SERVICES

ALERTS

NORWALK COMMISSIONERS

EMPLOYMENT

FARE INFO STORE

ANNOUNCEMENTS

WESTPORT DIRECTORS

PROCUREMENT

ADVERTISE O Ps



In August of 2020, the District worked with the Westport Transit District to convert their existing traditional commuter shuttles to an on-demand micortransit model. Services are flourishing.

Notice of Public Hearing



Proposed service and fare changes for Westport Commuter shuttles Effective August 2020

At the hearing, Westport Transit will receive formal public comment on the replacement of its seven commuter shuttle routes with an on-demand group Door-to-Station service operating between (a) Westport locations within the "Service Area" and (b) the Westport or Greens Farms stations. (Due to the coronavirus, on March 30, 2020 Westport Transit's seven routes were temporarily replaced with another on-demand service to and from the Westport and Greens Farms stations.)

Method for arranging rides: Passengers will utilize Norwalk Transit's Wheels2U App.

Hours of Operation: Morning pickups between 5:45AM and 9:45AM

Evening pickups between 4:00PM and 8:00PM

Fares: (1) \$2.00 single ride fare paid by the Wheels2U App or

(2) Uniticket (combined weekly or monthly Metro-North rail and bus pass)

For a map of the Service Area and additional information, including the presentation for the Public Hearing, please go to: Westporttransit.org. or call: 203-299-5164.

TELEPHONIC PUBLIC HEARING

Pursuant to the Governor's Executive Order No 7B, we will be holding the hearing electronically on Tuesday, July 21 from 7:00 PM to 9:00PM

Call: 646-876-9923 Then enter Meeting ID: 883 3169 9715

To Submit Written Testimony:

Visit: www.norwalktransit.com or e-mail: info@norwalktransit.com Write: Westport Transit commuter shuttle changes 275 Wilson Avenue, Norwalk, CT 06854

Must be received by July 22, 2020

If you need assistance in participating in a meeting or event due to a disability as defined under the Americans with Disabilities Act, please contact Westport's ADA Coordinator at 203-341-1043 or <a href="efficiences/englished-purples-substances/

Transit Enhancements

The opportunity for public participation presents itself when transit enhancements are considered that would support the delivery of services. Examples of such improvements include the installation of bus stop signs and shelters, ITS deployment, and establishing new

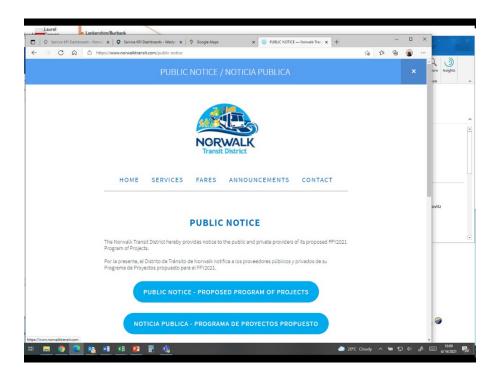
policies for use of services. Advisory committees and surveys play a major role in capturing public input.

For example, in the early stages of the selection and adoption of automated vehicle location (AVL) technology, the Intelligent Transportation System (ITS) committee played an integral role in the decision-making process.

Capital Planning

The Norwalk Transit District works in concert with the Western Council of Governments on long range planning. Projects for replacement of vehicles and facility improvements are included on the Transportation Improvement Plan which is vetted through an extensive public participation process. The document adopted by the Metropolitan Planning Organization (MPO) is then moved on to the State Transportation Improvement Plan.

The last notice of its Program of Projects occurred in June 2021 and before that June 2019. The Norwalk Transit District adopts its Program of Projects and advertises it prior to the application for federal funds. The public is invited to comment and/or to request a public meeting.



Website Notice

NORWALK TRANSIT DISTRICT PUBLIC NOTICE PROPOSED PROGRAM OF PROJECTS

The Norwalk Transit District hereby provides notice to the public and to private providers of its proposed FFY 2021 Program of Projects.

A. Notice of Application and Description of <u>Proposed Program of Projects:</u>

New Grant - Section 5307 (Urbanized Area Formula Funds)

The Norwalk Transit District is seeking financial assistance from the Federal Transit Administration (FTA) of the United States Department of Transportation under the Federal Transit Act of 1964, as amended and related statutes. The funds will be used as capital assistance for:

	State Share	Federal Share	Total
Miscellaneous Support Equipment, Section 5307, FFY 2021 for ITS, GPS, computer hardware and software technology and equipment necessary for bus, maintenance and administrative support and associated administrative costs for project implementation.	\$200,000	\$800,000	\$1,000,000
All phases of NTD Administrative, Storage and Maintenance (ASM) and Transit Hub Facilities Rehabilitation, expansion and improvements Section 5307, FFY 2021	\$2,600,000	\$10,400,000	\$13,000,000
Two Replacement Paratransit Vehicles out of 15 original replacements and supporting related services and equipment including administrative costs, Section 5307, FFY 2021. Balance for remaining replacements will be moved to FY 2022	\$32,000	\$128,000	\$160,000
Seven Replacement 2008 busses and supporting related services and equipment including administrative costs, Section 5307, FFY 2021.	\$790,000	\$3,160,000	\$3,950,000
TOTAL	\$3,622,000	\$14,488,000	\$18,110,000

The total proposed program of project cost is \$18,110,000.00. Projects are funded at an eighty percent (80%) federal share, for the capital projects, and will be provided under Sections 5307 of the Federal Transit Act, as amended. The FTA share for the total program of projects is \$14,488,000.00. The remaining funds will be provided by the State of Connecticut.

B. Environment:

It is proposed that there are no significant environmental impacts from this program of projects.

C. Comprehensive Planning:

This proposed program of projects is in conformance with the comprehensive land use and transportation planning in this area and has been included in the Transportation Improvement Plan (TIP).

D. Complete Project Descriptions and Financial Plans for Proposed Program of Projects: A copy of the project descriptions and the related financial plans are available for public inspection at the Norwalk Transit District's office, 275 Wilson Avenue, Norwalk, CT 06854 between 9:00 AM and 5:00 PM, business weekdays through July 15, 2021.

Any interested persons who request a public hearing on the program of projects must so notify the Norwalk Transit District by letter to be received no later than fifteen days after the publication of this announcement. Upon receipt of a request for a hearing, the Norwalk Transit District will publish a second notice stating the date, time, and location of the hearing no later than ten days before the scheduled hearing.

Written and oral comments will be taken into consideration prior to implementation of the program of projects. Said comments must be submitted to the Norwalk Transit District by July 15, 2021 and to the attention of Kimberlee A. Morton, CEO. In the event no comments are received, or a public hearing is not requested, the proposed program of projects as published will stand as the Final Program of Projects for the Norwalk Transit District for FFY 2021.

Kimberlee A. Morton, CEO Norwalk Transit District June 6, 2021

NORWALK TRANSIT DISTRICT PUBLIC NOTICE PROPOSED PROGRAM OF PROJECTS

The Norwalk Transit District hereby provides notice to the public and to private providers of its proposed FFY 2019 Program of Projects.

A. Notice of Application and Description of <u>Proposed Program of Projects:</u>
New Grant – Section 5307 (<u>Urbanized Area Formula Funds</u>) and <u>Section 5339 (Bus and Bus Facility Discretionary Funds</u>)
The Norwalk Transit District is seeking financial assistance from the Federal Transit Administration

The Norwalk Transit District is seeking financial assistance from the Federal Transit Administration (FTA) of the United States Department of Transportation under the Federal Transit Act of 1964, as amended and related statutes. The funds will be used as capital assistance for:

	State Share	Federal Share	Total
Farebox Replacement, Upgrade and Token Vending Machines, Miscellaneous Support Equipment, Section 5307, FFY 2019	\$200,000	\$800,000	\$1,000,000
All phases of NTD Facility Rehabilitation, Expansion and Improvements Section 5307, FFY 2019	\$1,750,000	\$7,000,000	\$8,750,000
Ten Replacement Paratransit Vehicles and supporting related services, Section 5307, FFY 2019	\$250,000	\$1,000,000	\$1,250,000
All phases of NTD Facility Rehabilitation, Expansion and Improvements Section 5339, FFY 2019	\$900,000	\$3,600,000	\$4,500,000
TOTAL	\$3,100,000	\$12,400,000	\$15,500,000

The total proposed program of project cost is \$15,500,000.00. Projects are funded at an eighty percent (80%) federal share, for the capital projects, and will be provided under Sections 5307 and 5339 of the Federal Transit Act, as amended. The FTA share for the total program of projects is \$12,400,000.00. The remaining funds will be provided by the State of Connecticut.

B. Environment:

It is proposed that there are no significant environmental impacts from this program of projects.

C. Comprehensive Planning:

This proposed program of projects is in conformance with the comprehensive land use and transportation planning in this area and has been included in the Transportation Improvement Plan (TIP).

D. Complete Project Descriptions and Financial Plans for Proposed Program of Projects: A copy of the project descriptions and the related financial plans are available for public inspection at the Norwalk Transit District's office, 275 Wilson Avenue, Norwalk, CT 06854 between 9:00 AM and 5:00 PM, business weekdays through January 9, 2020.

Any interested persons who request a public hearing on the program of projects must so notify the Norwalk Transit District by letter to be received no later than fifteen days after the publication of this announcement. Upon receipt of a request for a hearing, the Norwalk Transit District will publish a second notice stating the date, time and location of the hearing no later than ten days before the scheduled hearing.

Written and oral comments will be taken into consideration prior to implementation of the program of projects. Said comments must be submitted to the Norwalk Transit District by January 9, 2020 and to the attention of Kimberlee A. Morton, CEO. In the event no comments are received, or a public hearing is not requested, the proposed program of projects as published will stand as the Final Program of Projects for the Norwalk Transit District for FFY 2019.

Kimberlee A. Morton, CEO Norwalk Transit District December 9, 2019



Outreach was accomplished through the local news media; postings on all vehicles in English and Spanish; posting on the website; and distribution of the notice to advocacy organizations.

Regional Partnership & Capital Planning

For its capital programming, including major facility and vehicle procurements, the Norwalk Transit District uses the public participation plan adopted in 2021 by the Southwestern Region MPO. As a voting MPO member the District participates firsthand in the development and public participation process. The MPO plan indicates that the MPO's public participation process satisfies the Norwalk Transit District's public participation requirements for its Program of Projects. The notices for the regional Transportation Improvement Program also state that the notice of public involvement activities and times established for public review of and comment on the TIP will satisfy the FTA's Program of Projects requirements. In addition, the District performs its own outreach effort specific to the Norwalk Transit District projects.

Attached below is the newly stated MOU for the Bridgeport/Stamford TMA regarding Transportation Planning and Funding in the region executed by regional participants and the Commissioner of Transportation in April of 2021.



Trans Planning, Funding in Bridgepo

Public Outreach Efforts

Depending on the type of service change that is contemplated a variety of means are employed to encourage public participation. The measures taken are targeted to overcome linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and lowincome populations, persons with disabilities and persons with limited English proficiency from effectively participating in the Norwalk Transit District's decision-making process.

The potential for a change/enhancement to service/fares is a result of carefully evaluated data by appropriate Norwalk Transit District staff. The data collection will not only include ridership and financial analysis but recaps of community conversations and recommendations with targeted groups or organizations.

A proposal is then developed internally and presented to the Norwalk Transit District Commissioners, or in the case of Westport, the Westport Transit District Directors. Once the proposal is accepted, the proposal will proceed to the public comment period.

Public outreach meeting locations, dates and times will be determined with consideration of the proposed changes and their impact on specific locations/populations within the Norwalk Transit District service area.

When appropriate, meetings will be held at convenient and accessible locations for target populations. Partner locations include the Norwalk Library, Keystone (supporting persons with mental illness), STAR (supporting persons with developmental disabilities), and Senior Center South (supporting seniors of Hispanic descent). Spanish speaking employees are invited to attend meetings to translate for LEP persons. Norwalk Transit District contracts with a variety of vendors for interpreter and translation services on an as needed basis.

As many communication opportunities as possible should be used to seek public input. Methods will include notices posted and distributed on buses in both English and Spanish; legal

notices and news stories published in local newspapers; notices posted on the website with multi-lingual translation option; notices distributed at public meetings and to advocate organizations of various special interest groups, and Spanish speaking employees are asked to attend public meetings to be available to translate for Spanish-speaking persons with Limited English Proficiency.

The following will be considered in establishing appropriate locations:

- Convenience and accessibility for minority, persons with disabilities and LEP communities;
- 2) Size of venue should provide for meaningful dialogue; and
- 3) Invite community organization to help support public engagement strategies.

Next Steps

The Norwalk Transit District's public

participation plan has been consistently applied over the years and recognizes that on-going public participation benefits the organization. Several next steps noted in the previous plan period were not achieved due to the loss of personnel responsible and the climate of the COVID-19 pandemic specifically for these planning initiatives. The individual with direct responsibility for Title VI is the Chief Operating Officer (Title VI Officer) working in unison with

the Data and Planning Analyst, will jointly focus on revising policy standards, leveraging new technology resources, community building and improving administrative oversight as may be necessary.

Focus groups and building with community partners guide the transit agency on how to best engage with minority, low-income, senior/disabled, and LEP populations. The institution of a Passenger Advisory Committee will help address the challenge of engaging a wide breadth of populations in transportation planning.

With the adoption of the ITS AVL system, NTD uses it systems to extend its outreach efforts throughout the community through ongoing service announcements on overhead bus signage and on display monitors located at its transit Hub, railroad stations. and local community college. The District also actively utilizes Twitter in English and Spanish for up-to-date service deviations and problems.

Responsible staff will work jointly with the responsible staff members to oversee public relations campaigns and communications on behalf of the District, including development of an overall communications strategy to increase positive public awareness of the Norwalk Transit District and promotion of public transportation as a valuable community service. Current successful campaigns included joint promotional opportunities with local businesses including restaurants, Maritime Aquarium, Wall Street Theatre, the Public Library and City of Norwalk "Ban the Bag program." We have provided free and deeply discounted interior bus advertising space for civic, community and non-profit agencies.

Each program promotes the use of public transportation and/or the District as a partner in conjunction with the promotional opportunities and services and programs offered. These efforts will be ongoing which include making consistent and continuous contact with existing partners and various other stakeholders including City/Town departments, outside agencies and organizations, civic and community groups, and the public for the purpose to establish and maintain an effective community relations program.

The Norwalk Transit District was the proud recipient of the 2020 APTA AdWheel Grand Award for the best marketing and communication to highlight transit needs. This project was a comprehensive campaign of communications and public awareness promotions including community partnerships exemplifying the true meaning of public outreach.



LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency

As a first step, and to ensure meaningful access to programs and activities, The Norwalk Transit District uses the information obtained in a **Four Factor Analysis** to determine the specific language services that are appropriate. This analysis helps the Transit Agency to determine if it communicates effectively with LEP persons and supports language access planning.

Limited English Proficiency (LEP)

Persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **Four Factor Analysis** is a local assessment that considers:

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by The Norwalk Transit District;
- 2. The frequency with which LEP persons come into contact with The Norwalk Transit District services and programs;
- 3. The nature and importance of The Norwalk Transit District services and programs in people's lives; and,
- 4. The resources available to The Norwalk Transit District for LEP outreach, as well as the costs associated with that outreach.

The Norwalk Transit District's Language Assistance Plan incorporates all reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of The Norwalk Transit District's programs and activities for LEP individuals.

The language assistance plan has the following key elements:

- Identification of LEP individuals who need language assistance in The Norwalk Transit District service area (using the four-factor analysis that follows);
- Determination of the appropriate language assistance measures based on what is learned;
- Training of all employees regarding LEP policies and procedures;
- Providing notification to LEP persons of the language services offered by The Norwalk Transit District; and,
- Procedures to monitor and update the Language Assistance Plan.

FOUR FACTOR ANALYSIS

Factor 1 - The number or proportion of LEP persons eligible to be served or likely to be encountered by Norwalk Transit services

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of Limited English Proficient (LEP) persons who may encounter NTD's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as-a-result of a language barrier. Data for this review is derived from U.S. Census Bureau American Community Survey 2019 one-year estimate data for the Fairfield County comparisons. The newest available data for the Norwalk Transit District Service area comparisons was obtained from the U.S. Census Bureau American Community Survey 2019 five-year data. The previous plan used the U.S. Census Bureau American Community Survey 2017 five-year data.

Overview of Regional Service Area

From a regional service perspective, the Norwalk Transit District provides public transit services throughout a large part of Fairfield County however the largest City residing in the County is Bridgeport. Norwalk Transit District is not responsible for communicating services in the City of Bridgeport and relies on the Greater Bridgeport Transit to correspond service announcements that may impact regional services. Although there are similarities in the demographics of the cities, significant economic differences exist which impacts the demographic make-up of the service area. Utilizing Fairfield county data alone to determine Safe Harbor Languages would not be representative of the Norwalk Transit District service area.

The following table breakdowns depicts the results of the Safe Harbor analysis for Fairfield County utilizing 2019 data estimates in comparison to the 2019 data specific to the Norwalk Service area. The District has determined that the 2019 U.S. Census America Community Survey data to be the best source as it is inclusive of all City and Towns that the District serves.

2019 Fairfield County Data Versus 2019 Norwalk Transit Service Area Data

Table 1 Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates

Language	2019 Fairfield County Population	2019 Percentage of Total County Population	2019 Norwalk Service area Population	2019 Percentage o Total Norwalk Service Area
Spanish or Spanish Creole	146,447	16.46%	51,936	18.46%
Portuguese or Portuguese Creole	23,078	2.59%	1,759	0.63%
French	6,980	0.78%	2,493	0.89%
French Creole	9,005	1.01%	6,509	2.31%
Chinese	1,761	0.20%	3,344	1.19%
Italian	6,690	0.75%	3,487	1.24%
Polish	2,494	0.28%	2,973	1.06%
German	2,793	0.31%	1,227	0.44%
Greek	7,480	0.84%	2,530	0.90%
Yiddish	612	0.07%	47	0.02%
Other West Germanic Languages	7,511	0.84%	447	0.16%
Scandanavian	3,095	0.35%	520	0.18%
Russian	1,855	0.21%	2,094	0.74%
Serbo-croatian	374	0.04%	289	0.10%
Other Slavic languages	322	0.04%	1,020	0.36%
Armenian	2,678	0.30%	57	0.02%
Persian	2,348	0.26%	131	0.05%
Gujarati	1,846	0.21%	451	0.16%
Hindi	535	0.06%	3,082	1.10%
Urdu	1,868	0.21%	881	0.31%
Other Indic Language	999	0.11%	1,704	0.61%
Other Indo European Language	5,140	0.58%	1,236	0.44%
Japanese	2,287	0.26%	890	0.32%
Korean	589	0.07%	600	0.21%
Mon-Khmer, Cambodian	9,170	1.03%	42	0.01%
Hmong	1,953	0.22%	0	0.00%
Thai	1,973	0.22%	126	0.04%
Laotian	0	0.00%	15	0.01%
Other Asian	811	0.09%	2,276	0.81%
Vietnamese	1,614	0.18%	141	0.05%
Tagalong	669	0.08%	1,408	0.50%
Other Pacific Island Languages	1,297	0.15%	110	0.04%
Navajo	2,259	0.25%	0	0.00%
Other Native American	363	0.04%	0	0.00%
Hungarian	2,242	0.25%	353	0.13%
Arabic	194	0.02%	755	0.27%
Hebrew	27	0.00%	453	0.16%
African	3,788	0.43%	379	0.13%
Unspecified	86	0.01%	97	0.03%
English Speaking	624,583	70.19%	185,963	66.11%
Totals	889,816		281,825	

Overview of Local Service Area

For this section of this analysis the most recent data available containing the LEP statistics representative of the Norwalk Transit District service area is contained in the U.S. Census Bureau American Community Survey 2015-2019 five-year data.

To better evaluate the proportion of LEP persons eligible to be served or likely to be encountered by Norwalk Transit services, this analysis takes an even closer look at certain municipalities of the southwestern Connecticut. To define a local service area, Norwalk Transit District fixed route and/or demand-response services operate within the municipalities of Norwalk, Westport, Wilton, Stamford, Greenwich, and Darien. (New Canaan and Weston are excluded because these municipalities do not currently receive any services provided by the Norwalk Transit District.) Of the local service area population (281,825), 13.72% or 38,674 reported speaking English "less than very well."

The following tables show the proportion of the population within the local service area that speaks English "less than very well."

Of the population, Spanish speaking persons are 18.43% of the total local service area population. Of that 18.43% population, Spanish speaking persons with limited English proficiency represent 49.15% of the local service area population.

Speakers of Spanish

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	796	3.09%	162	20.35%	0.63%
Wilton	17,639	223	1.26%	52	23.32%	0.29%
Stamford	118,171	27,550	23.31%	14,066	51.06%	11.90%
Greenwich	11,867	1,628	13.72%	759	46.62%	6.40%
Norwalk	88,612	20,929	23.62%	10,393	49.66%	11.73%
Darien	19,789	810	4.09%	93	11.48%	0.47%
Local Service Area Total	281,825	51,936	18.43%	25,525	49.15%	9.06%

Table 2 Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates

Speakers of French, Haitian, French/Haitian Creole, or Cajun

French, Haitian, or Cajun: speaking persons are 3.12% of the total local service area population. Of that population, 32.80% speak English "less than very well." French, Haitian, or Cajun

speaking persons with limited English proficiency represent 1.02% of the local service area population

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	195	0.76%	19	9.74%	0.07%
Wilton	17,639	146	0.83%	0	0.00%	0.00%
Stamford	118,171	5,012	4.24%	1,968	39.27%	1.67%
Greenwich	11,867	90	0.76%	28	31.11%	0.24%
Norwalk	88,612	3,229	3.64%	861	26.66%	0.97%
Darien	19,789	112	0.57%	5	4.46%	0.03%
Local Service Area Total	281,825	8,784	3.12%	2,881	32.80%	1.02%

German or other West Germanic languages

German or other West Germanic languages speaking persons are .44% of the total local service area population. Of that population, 11.7% speak English "less than very well." German or other West Germanic speaking persons with limited English proficiency represent 0.05% of the local service area population.

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	135	0.52%	23	17.04%	0.09%
Wilton	17,639	117	0.66%	13	11.11%	0.07%
Stamford	118,171	367	0.31%	28	7.63%	0.02%
Greenwich	11,867	145	1.22%	15	10.34%	0.13%
Norwalk	88,612	168	0.19%	8	4.76%	0.01%
Darien	19,789	295	1.49%	50	16.95%	0.25%
Local Service Area Total	281,825	1,227	0.44%	137	11.17%	0.05%

Speakers of Russian

Russian speaking persons are .74% of the total local service area population. Of that population, 31.66% speak English "less than very well." Russian speaking persons with limited English proficiency represent .24% of the local service area population.

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	228	0.89%	79	34.65%	0.31%
Wilton	17,639	120	0.68%	0	0.00%	0.00%
Stamford	118,171	1,392	1.18%	444	31.90%	0.38%
Greenwich	11,867	91	0.77%	61	67.03%	0.51%
Norwalk	88,612	224	0.25%	79	35.27%	0.09%
Darien	19,789	39	0.20%	0	0.00%	0.00%
Local Service Area Total	281,825	2,094	0.74%	663	31.66%	0.24%

Speakers of Polish

Polish speaking persons are 1.05% of the total local service area population. Of that population, 47.16% speak English "less than very well." Polish speaking persons with limited English proficiency represent .50% of the local service area population.

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	27	0.10%	0	0.00%	0.00%
Wilton	17,639	69	0.39%	38	55.07%	0.22%
Stamford	118,171	2,063	1.75%	1,082	52.45%	0.92%
Greenwich	11,867	154	1.30%	90	58.44%	0.76%
Norwalk	88,612	641	0.72%	192	29.95%	0.22%
Darien	19,789	19	0.10%	0	0.00%	0.00%
Local Service Area Total	281,825	2,973	1.05%	1,402	47.16%	0.50%

Speakers of Chinese

Chinese speaking persons are 1.19% of the total local service area population. Of that population, 38.97% speak English "less than very well." Korean speaking persons with limited English proficiency represent 0.46% of the local service area population.

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	464	1.80%	151	32.54%	0.59%
Wilton	17,639	367	2.08%	172	46.87%	0.98%
Stamford	118,171	1,588	1.34%	680	42.82%	0.58%
Greenwich	11,867	119	1.00%	57	47.90%	0.48%
Norwalk	88,612	549	0.62%	181	32.97%	0.20%
Darien	19,789	257	1.30%	62	24.12%	0.31%
Local Service Area Total	281,825	3,344	1.19%	1,303	38.97%	0.46%

Speakers of Tagalog

Tagalog speaking persons are 0.5% of the total local service area population. Of that population, 29.33% speak English "less than very well." Tagalog speaking persons with limited English proficiency represent 0.15% of the local service area population.

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	150	0.58%	0	0.00%	0.00%
Wilton	17,639	109	0.62%	5	4.59%	0.03%
Stamford	118,171	645	0.55%	204	31.63%	0.17%
Greenwich	11,867	229	1.93%	173	75.55%	1.46%
Norwalk	88,612	275	0.31%	31	11.27%	0.03%
Darien	19,789	0	0.00%	0	0.00%	0.00%
Local Service Area Total	281,825	1,408	0.50%	413	29.33%	0.15%

Speakers of Japanese

Japanese speaking persons are 0.32% of the total local service area population. Of that population, 52.36% speak English "less than very well." Japanese speaking persons with limited English proficiency represent 0.17% of the local service area population.

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	6	0.02%	0	0.00%	0.00%
Wilton	17,639	43	0.24%	0	0.00%	0.00%
Stamford	118,171	158	0.13%	45	28.48%	0.04%
Greenwich	11,867	199	1.68%	152	76.38%	1.28%
Norwalk	88,612	426	0.48%	229	53.76%	0.26%
Darien	19,789	58	0.29%	40	68.97%	0.20%
Local Service Area Total	281,825	890	0.32%	466	52.36%	0.17%

Speakers of Italian

Italian speaking persons are 1.24% of the total local service area population. Of that population, 27.22% speak English "less than very well." Italian speaking persons with limited English proficiency represent 0.34% of the local service area population.

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	321	1.25%	35	10.90%	0.14%
Wilton	17,639	288	1.63%	95	32.99%	0.54%
Stamford	118,171	1,377	1.17%	503	36.53%	0.43%
Greenwich	11,867	145	1.22%	0	0.00%	0.00%
Norwalk	88,612	1,231	1.39%	271	22.01%	0.31%
Darien	19,789	125	0.63%	45	36.00%	0.23%
Local Service Area Total	281,825	3,487	1.24%	949	27.22%	0.34%

Speakers of Portuguese or Portuguese Creole

Portuguese speaking persons are 0.62% of the total local service area population. Of that population, 18.99% speak English "less than very well." Portuguese speaking persons with limited English proficiency represent 0.12% of the local service area population.

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	148	0.57%	26	17.57%	0.10%
Wilton	17,639	49	0.28%	0	0.00%	0.00%
Stamford	118,171	643	0.54%	89	13.84%	0.08%
Greenwich	11,867	439	3.70%	67	15.26%	0.56%
Norwalk	88,612	469	0.53%	141	30.06%	0.16%
Darien	19,789	11	0.06%	11	100.00%	0.06%
Local Service Area Total	281,825	1,759	0.62%	334	18.99%	0.12%

Speakers of Greek

Greek speaking persons are 0.90% of the total local service area population. Of that population, 27.04% speak English "less than very well." Greek speaking persons with limited English proficiency represent 0.24% of the local service area population.

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	168	0.65%	33	19.64%	0.13%
Wilton	17,639	19	0.11%	0	0.00%	0.00%
Stamford	118,171	1,063	0.90%	277	26.06%	0.23%
Greenwich	11,867	47	0.40%	12	25.53%	0.10%
Norwalk	88,612	1,217	1.37%	362	29.75%	0.41%
Darien	19,789	16	0.08%	0	0.00%	0.00%
Local Service Area Total	281,825	2,530	0.90%	684	27.04%	0.24%

Speakers of Hindi

Hindi speaking persons are 1.09% of the total local service area population. Of that population, 14.63% speak English "less than very well." Hindi speaking persons with limited English proficiency represent 0.16% of the local service area population.

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	165	0.64%	0	0.00%	0.00%
Wilton	17,639	42	0.24%	0	0.00%	0.00%
Stamford	118,171	2,186	1.85%	373	17.06%	0.32%
Greenwich	11,867	42	0.35%	13	30.95%	0.11%
Norwalk	88,612	550	0.62%	54	9.82%	0.06%
Darien	19,789	97	0.49%	11	11.34%	0.06%
Local Service Area Total	281,825	3,082	1.09%	451	14.63%	0.16%

Speakers of Urdu

Urdu speaking persons are .31% of the total local service area population. Of that population, 14.19% speak English "less than very well." Urdu speaking persons with limited English proficiency represent 0.04% of the local service area population.

Municipality	Total Population	Speakers	% of total population	Speak English "less than very well"	% of LEP population that speak English"less than very well"	% of total population that speak English"less than very well"
Westport	25,747	0	0.00%	0	#DIV/0!	0.00%
Wilton	17,639	5	0.03%	0	0.00%	0.00%
Stamford	118,171	600	0.51%	31	5.17%	0.03%
Greenwich	11,867	8	0.07%	0	0.00%	0.00%
Norwalk	88,612	63	0.07%	30	47.62%	0.03%
Darien	19,789	205	1.04%	64	31.22%	0.32%
Local Service Area Total	281,825	881	0.31%	125	14.19%	0.04%

Safe Harbor Provision

In the 2019 plan submittal there were two languages identified as meeting the Safe Harbor

threshold defined as "five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered. Due to changes in the collection of Limited English Proficiency population and their language groupings, these groups have changed. Japanese and Urdu no longer meet the Safe Harbor threshold, but the District will continue to carry them as Safe Harbor languages. No new languages meet the threshold requirements.

Identified as Safe Harbor languages using the 5%- or 1,000-person rule, the Norwalk Transit District as established previously and reconfirms under this plan the following languages contained in the table below. The only language reaching this 5% threshold would be Spanish speakers that speak English "less than well".

Safe Harbor Languages

Language	2019 Fairfield County Population	2019 Percentage of Total County Population	2019 Norwalk Service area Population	2019 Percentage of Total Norwalk Service Area
Spanish or Spanish Creole	146,447	16.46%	51,936	18.46%
Portuguese or Portuguese Creole	23,078	2.59%	1,759	0.63%
French	6,980	0.78%	2,493	0.89%
French Creole	9,005	1.01%	6,509	2.31%
Chinese	1,761	0.20%	3,344	1.19%
Italian	6,690	0.75%	3,487	1.24%
Polish	2,494	0.28%	2,973	1.06%
German	2,793	0.31%	1,227	0.44%
Greek	7,480	0.84%	2,530	0.90%
Russian	1,855	0.21%	2,094	0.74%
Hindi	535	0.06%	3,082	1.10%
Urdu	1,868	0.21%	881	0.31%
Japanese	2,287	0.26%	890	0.32%
Tagalong	669	0.08%	1,408	0.50%

^{*}Local Service Area defined as Westport, Wilton, Stamford, Greenwich, Norwalk, and Darien

Vital Documents

As a matter of practice, many of the agency's written and verbal communications and documents are provided in both English and Spanish. However, documents pertaining to vital subject matter can also be translated into other languages upon request. Those vital documents include:

- Language Assistance Rail Cards
- Consent and complaint forms, such as customer comment and Title VI discrimination
- Intake and application forms, such as the ADA complementary paratransit eligibility application
- ADA User Guide
- Notice of denials, losses, or decreases in benefits or services
- Notice of person's rights under Title VI
- Notice advising LEP individuals of free language assistance services
- Guidance on how to contact the transit agency
- Guidance on how to obtain schedule and route information, notice of and participate in public events and outreach, how to file a complaint and explanation of half fare

Below is the copy of our language assistance rail cards that are be displayed in all vehicles alongside our Title VI policy statement.

FREE LANGUAGE ASSISTANCE

English: For language assistance or other accommodations, contact Norwalk Transit at info@norwalktransit.com Please include a phone number so that an interpreter can call you back.

Spanish: Para asistencia lingüística u otras adaptaciones, comuníquese con Norwalk Transit a: spanishinfo@norwalktransit.com Favor de incluir su número de teléfono para que un intérprete le devuela su llamada

Portuguese: Para assistência com idiomas ou outras dúvidas, entre em contato com a Norwalk Transit através do: portugueseinfo@norwalktransit.com Por favor, você poderia incluir o seu número de telefone para que um intérprete possa retornar a chamada

French: Pour obtenir une assistance linguistique ou d'autres types d'aides, contactez Norwalk Transit à: frenchinfo@norwalktransit.com S'il vous plaît, veuillez indiquer un numéro de téléphone pour qu'un interprète puisse vous rappeler.

Haitian Creole: Pou jwenn asistans nan Lang oswa lòt èd, tanpri kontakte Norwalk Transit nan: frenchcreoleinfo@norwalktransit.com Tanpri mete yon nimewo telefòn pou yon entèprèt ka rele ou

Chinese: 如需语言协助或其他帮助,请联系 Norwalk Transit:

chineseinfo@norwalktransit.com 请留下您的电话号码,口译员稍后会和您联络

Italian: Per assistenza linguistica o altri tipi di aiuto, contattare Norwalk Transit al seguente indirizzo: <u>italianinfo@norwalktransit.com</u> Per favore includi un numero di telefono in modo che un interprete ti puo richiamare

Polish: Aby uzyskać wsparcie językowe lub inny rodzaj pomocy, należy skontaktować się z Norwalk Transit pod adresem: polishinfo@norwalktransit.com Prosze podac swoj numer telefonu aby tlumacz mogl do Pani/ Pana oddzwonic.

German: Für sprachliche Unterstützung oder sonstige Unterkünfte wenden Sie sich bitte an Norwalk Transit germaninfo@norwalktransit.com Bitte geben Sie eine Telefonnummer an so

dass ein Dolmetscher Sie zurückrufen kann.

Greek: Για γλωσσική βοήθεια ή άλλη διευκόλυνση, επικοινωνήστε με την Norwalk Transit στο <u>greekinfo@norwalktransit.com</u> Προσθέστε έναν αριθμό τηλεφώνου και ένας διερμηνέας θα σας καλέσει πίσω

Russian: Для получения языковой помощи или других удобств, свяжитесь с Norwalk Transit по адресу russianinfo@norwalktransit.com Пожалуйста, предоставьте свой номер телефона чтобы переводчик мог перезвонить В

Japanese: 日本語でのサービスやその他のご用件が必要な場合はノーウォーク交通局へご連絡ください。japaneseinfo@norwalktransit.com 通訳が折り返しお電話しますので、連絡先をお願い致します。

Tagalog: Para sa tulong sa wika o ibang mga bagay (tirahan), makipag-ugnay sa Norwalk Transit sa tagaloginfo@norwalktransit.com Pakiusap lamang na isama ang numero ng iyong telepono para matawagan kang pabalik ng tagasalin sa wikang tagalog

Urdu: تلوہس روا یئوک کی حرط کسی یا ےئیہاچ ددم ںیم سلسلے کے ےمجرة ںیم نابز یکپآ وک پآرگا کیجیے ہطبار سے urduinfo@norwalktransit.com ٹزنارڈ کی کاور انرپ لیم یا سا وۃ ے ہر راکرد سکے رک نوف سپاووک پآ نامجرۃ یئوک مکاۃ urduinfo@norwalktransit.com بھیجیئے ربمذنوف انپا ینابرہم ےئارب

Hindi: भाषा सहायता या अन्य आवास के ♦लए, नावः क वृं•्रेसट hindiinfo@norwalktransit.com पर संपत्रः करें | कुपया एक फोन नंबर शां•्रेमल करें तां•्रेक एक दबां•्रेशया आपको वापस बला सकें |

English: For language assistance or other accommodations, contact Norwalk Transit at info@norwalktransit.com Please include a phone number so that an interpreter can call you back.

Spanish: Para asistencia lingüística u otras adaptaciones, comuniquese con Norwalk Transit a: spanishinfo@norwalkransit.com Favor de incluir su número de teléfono para que un intérprete le deu sale su literando.

Portuguese: Para assistência com idiomas ou outras dúvidas, entre em contato com a Norwalk Transa itarvela do protugueseinfo@morvalktransi com Por favo, você poderia incluir o seu número de telefone para que um intérprete possa retornar a chamada

French: Pour obtenir une assistance linguistique ou d'autres types d'aides, contactez Norwalk Transit à: frenchinfo@norwalktansit com S'il vous plait, veuillez indiquer un numéro de téléphone pour qu'un interpréte puisse vous rappeler.

French Creole: Pou jwenn asistans nan Lang oswa lôt éd, tanpri kontakte Norwalk Transit nan: frenchcreoleinfo@norwalktransit.com Tanpri mete yon nimewo telefan pou yon entéprêt ka rele ou

Chinese: 如雲语音协助或具性帮助,请求系 Norwalk Transit: <u>chineseinfo@norwalktransit.com</u> 请留下您的电话号码,口译员得后会和您联络。

Italian: Per assistenza linguistica o altri lipi di auto, contattare Norwalk Transit al seguente indrizzo: <u>lialaninto@norwalktranst.com</u> Per favore includi un numero di telefono in modo che un interprete il puo richiamare

Polish: Aby uzyskać wsparcie językowe lub irny rodzaj pomocy, należy skontaktować się z Norwalk Transit pod adresem: <u>polishinfo@notwalktransit.com</u> Prosze podac swoj numer telefonu aby tlumacz mogł do Panl/Pana oddziennio.



Free Language Assistance

German: Für sprachliche Unterstützung oder sonstige Unterkünfte wenden Sie sich bitte an Norwalk Transit germannfo@norwalktransit.com Bitte geben Sie eine Telefonnummer an so dass ein Dolmetscher Sie zurückurden kann.

Greek: Για γλωστική βοήθεια ή άλλη διευκόλυνση, επικοινωνήστε με την Norwalk Transit στο <u>greekinfo@norwalktransit.com</u> Προσθέστε έναν αριθμό τηλεφώνου και ένας διερμηνέας θα σας καλέσει πίσω

Russian: Для получения языковой помощи или других услуг, свяжитесь с Norwalk Transit по адресу <u>russianinfo@norwalktransit.com</u> Пожалуйста, предоставте свой номер телефона чтобы переводчик мог перезвонить Вам

Japanese: 日本語でのサービスやその他のご用件が必要な場合はノーウォーク交通局へご連絡ください。japaneseinfo@nervalktransk.com 通訳が折り返しお電話致します。

Tagalog: Para sa tulong sa wika o ibang mga bagay (tirahan), makipag-ugnay sa Norwaik Transit sa tagaloginfo@norwaiktransit.com Pakiusap lamang na isama ang numero ng iyong telepono para matawagan kang pabalik ng tagasalin sa wikang tagalog

Urdu:

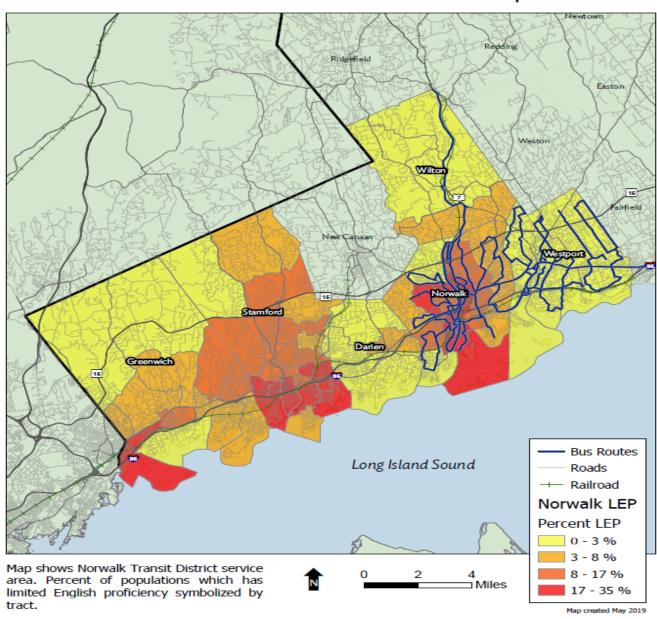
اگر آپ کو آپکی زبان میں ترجمے کے مششتے میں منہ چاہتے یا کسی طرح کی کوئی اور سوفات ترکز ہے کر اس ای urdunio@nowektransk.com نے ایک برائڈ کی اور انٹرنس نے رابطہ کھیے اور اتنے میریالی اینا فون نمبر بھیجیئے تک، کوئی ترجمان آپ کورایس فون کی سکے

Hindi: माथा सहायता या अन्य आवास के लिए, नार्वाक ट्रांसिट <u>hindinfo@norvalkiransit.com</u> पर संपर्क करें । कृष्या एक पर्पन संवर शामिस करे ताकि एक दुवांस्थि। आपको वापस बुला सकें ।

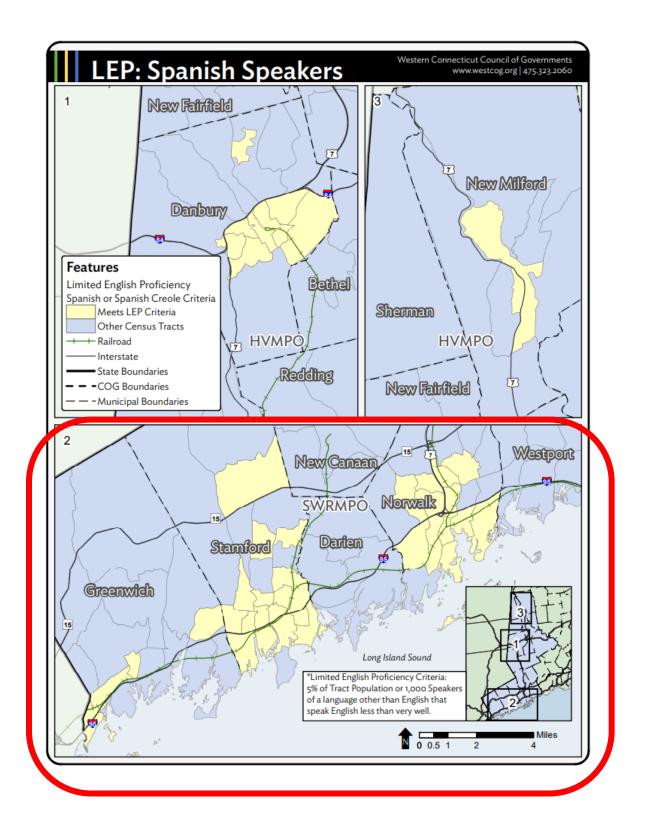
Location of the LEP Community

The map that follows provides a spatial display of residents of Norwalk with limited English proficiency in relation to local bus service. Within the City of Norwalk at the census tract level, it is seen that the largest number of persons identified as having limited English proficiency reside within areas served by the Norwalk Transit District fixed route services. More specifically, large concentrations of Spanish speaking persons are found within the South Norwalk and southern Stamford areas, which has the most frequent and most comprehensive fixed-route and ADA services.

Norwalk Transit District Services and LEP Populations



Norwalk Transit District Service Area and LEP Population Reaching 5% Safe Harbor Threshold



Factor 2 – The frequency with which LEP persons come into contact with Norwalk Transit District services and programs.

There are several places where members of the LEP population can come into contact with NTD services including the use of fixed route and demand response buses, calls to customer service representatives, reservation agents and NTD's outreach materials. An important part of the development of NTD's Language Access Plan is the assessment of major points of contact, including:

- Use of bus services (i.e., on-board signage, announcements, driver language skills, etc.)
- Communication with customer service staff
- Bus pass sales
- Printed outreach materials
- Web-based outreach materials
- Public meetings
- Demand-response reservation agents
- Local news media (e.g., print and radio)
- Automatic, service-related audio announcements on-board buses
- Service-related posters at NTD's bus terminal

Employees as a Resource

To better understand the frequency with which LEP persons come into contact with Norwalk Transit District services, an internal survey of employees was completed in January 2022. The objective of the language survey was to determine the current language resources at the transit agency and measure the number and nature of the encounters with customers where language may be a barrier.

The first question asked Norwalk Transit District employees if they could communicate in a language other than English, and if so, what language(s) or dialect(s). Employees admitted various levels of fluency. 57% of those responding speak another dialect other than English. This is slightly more than previous the results from 2019 which indicated 42% of the employees had various levels of fluency. It was also determined that individuals within the organization are able to speak multiple languages enhancing NTD's ability to address LEP persons.

More than half of Norwalk

Transit District Employees responding Speak a Language or Dialect Other

than English

Norwalk Transit Employees as a Language Resource

	Operators	5	ent	ent		ries Se		
	Fixed-Route	ADA/ Shuttles	Operations Department	Dispatch/ADA	Maintenance & Facilities	Administrative Office	TOTAL	% of group
Response by Department	12	9	1	2	3	8	35	
English Speakers Only	6	5	0	1	1	3	16	46%
Another Dialect other than English	6	4	1	1	2	5	19	54%

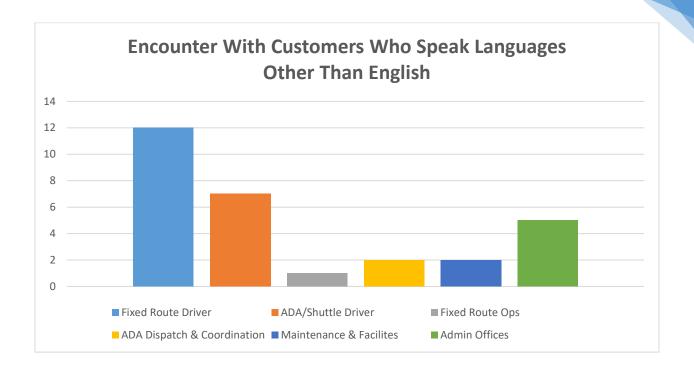
Employees Who Proficiently Speak Other Language(s) Or Dialect(s)

	Operators		ns nt	tch	ø Ø	tive	
Language or ' Dialect Spoken	Fixed Route	ADA/ Shuttle	Operations Department	ADA/Dispatch	Maintenance Facilities	Administrative Office	TOTAL
Spanish	3	0	1	1	0	4	9
French or Haitian Creole	3	4	0	0	0	1	8
Italian	1	0	0	0	0	0	1
Serbo Croatian or Albanian	1	0	0	0	0	1	2
Greek	2	0	0	0	0	0	2
Total	10	4	1	1	0	6	22

Next the survey asked if the employees had encountered customers who spoke languages other than English. Nearly all employees encountered customers speak languages other than English. The majority of non-encounters came from employees within the Maintenance

83% of Norwalk Transit District Employees
Encounter Customers who speak languages other
than English

and Facilities Department which, in general, has little interaction with customers.



Employees were asked, "On which routes or services do you most frequently interact with customers with limited or no English proficiency?" Norwalk Transit District employees are interacting with customers with limited English proficiency in a variety of settings. Norwalk Fixed route and ADA/shuttle drivers experience the greatest number of encounters with LEP person.

The next question asked, "What are commonly asked questions from customers unable to communicate in English?" In the experience of Norwalk Transit District drivers and staff, the most common inquiries made by non-English speakers generally regard the following and are ranked in the order of most commonly encountered.

- 1. Schedule and route information
- 2. What bus do I take?
- 3. Fare information (e.g., adding funds to the RMPay account)
- 4. Directions to a specific location
- 5. Information on door-to-door rides (e.g., eligibility, cost, and how the service operates)

The Norwalk Transit District values the input of those employees who most frequently encounter LEP persons. Therefore, the final question in the survey asked, "How can Norwalk Transit District better assist passengers who are unable to speak or read English?"

A number of respondents claimed that the diverse driver core serves as a wide range language resource with a strong base in Spanish. In their experience, they find Spanish and Haitian Creole speakers the individuals seeking language assistance. Norwalk Transit services and encouraged cooperation amongst drivers in assisting LEP passengers.

The following suggestions will serve the Norwalk Transit District as the agency enhances its Language Assistance Plan:

Non-Englishspeaking passengers
often begin by
inquiring if the driver or
staff person speaks
their language or
if the passenger can
be assisted by
someone who Can.

- Continued use universal symbols based on numbers, images, and colors to communicate information
- After completion of our Comprehensive Operations Analysis planning study anticipated in FY 2024, NTD will design a route map and map of the City of Norwalk large enough for visual interpretation to be posted at the Hub that will specify major destinations
- Continued contracting and usage of a translation hotline that is readily available to staff
- Continue to prepare route and service information material in the major language of Spanish and other languages on request
- Continue to post fliers on all vehicles instructing how to obtain proper identification for half fare in the major language of Spanish and other languages on request
- Continue to maintain a list of the names of drivers who speak another language for dispatch to contact
- Post a message board at the Hub with service updates in Spanish and other languages by request.
- Continue to hire staff in dispatch and operations with multi-lingual capabilities
 Continue to add additional languages when new LEP languages are identified for populations with limited English proficiency that meet the Safe Harbor Provisions.

Community Partners

As part of this assessment, NTD canvassed its community partners. The partners are listed below.

Name	Department	Emails
Biagiarelli, Lisa	Tax Collector	lbiagiarelli@norwalkct.org
Bradley, Chris	Library Director	
Burney Ray	Personnel & Labor Rel.	rburney@norwalkct.org
Carr, Anthony	Chief of Operations & Public	acarr@norwalkct.org
	Works	
Casey, Jessica	Chief of Development &	<u>Jcasey@norwalkct.org</u>
	Community Affairs	
D'Amore, Deanna	Health Director	ddamore@norwalkct.org
Dachowitz, Henry	Chief Finance Officer	hdachowitz@norwalkct.org
Del Vecchio, Karen	IT	Kdelvecchio@norwalkct.org
Gatto, Gino	Fire Chief	ggatto@norwalkct.org
Ireland, Bill	Building Dept.	bireland@norwalkct.org
Keegan, Anna	Human Relations	akeegan@norwalkct.org
King, Laoise	Chief of Staff	lking@norwalkct.org
Kleppin, Steven	P & Z	skleppin@norwalkct.org
Kulhawik, Tom	Police Chief	tkulhawik@norwalkct.org
Lo, Alan	Building Management	lalan@norwalkct.org
McQuaid, Richard	Town Clerk	rmcquaid@norwalkct.org
Morgan, Josh	Com. Dir./Grants Coord.	jmorgan@norwalkct.org
Morton, Kim	NTD Director	kmorton@norwalktransit.com
Rogers, Nick	Recreation & Parks Dir.	
Spahr, Jeff/Mario Coppola	Law Department	mcoppola@norwalkct.org
Suib, Margaret	Fair Housing Officer	msuib@norwalkct.org
Valenzisi, Ralph	Education	rvalezisi@norwalkct.org
Walenczyk, David	Youth Services	dwalenczyk@norwalkct.org
For all Council Members		CommonCouncil3@norwalkct.org
The Kennedy Center	Margaret Mixon	mmixon@kennedyctr.org
Norwalk Community Health Center	Eva Beau	ebeau@norwalkchc.org
Human Services Council	Nancy Pratt	npratt@hscct.org
The Carver Foundation	Elsie Lopez	elsie@carvercenterct.org
Norwalk Senior Center	Michele Jakab	mjakab@norwalksc.org
Community Health Center, Inc.	Online submission form	http://www.chc1.com/Contact
Cooperative Educational Services	Matt Engelhardt	engelham@ces.k12.ct.us
Family and Children's Agency	Kathy Seiden	kseiden@fcagency.org
RiverHouse	Donna Spellman	dspellman@theriverhouse.org
Elderhouse, Inc.	Denise Cesareo	dcesareo@elderhouse.org
Norwalk Chamber of Commerce		ben@greaternorwalkchamber.com
Westcog	Transportation	
Norwalk Redevelopment Agency	·	koleary@norwalkct.org

Consulting Directly with the LEP Population

A passenger survey was last performed in January of 2022. Passenger surveys are always offered in English and Spanish. For this year's Title VI submission, we broaden the list of languages we offered the survey based upon U.S. Census American Community Survey language spoken at home data information for the Norwalk Transit District service area. These additional languages were: Chinese, French, Haitian Creole, Polish, Russian and Slovak. From survey response and participation, we can infer rider demographics and accessibility of our communication strategies.

The Passenger survey was conducted on all bus routes and ADA paratransit vehicles. The survey measured family income, trip purpose, ability to speak English and other question pertaining to bus service and their knowledge of Title VI. Despite the availability of the survey in multiple languages, the only survey responses we received were from the individual that spoke English, French, Haitian Creole, and Spanish. Passengers were also engaged and encourages to take the Title VI survey at our April 2022 Passenger Advisory Committee meeting.

Factor 3 – The nature and importance of Norwalk Transit District services and programs in people's lives.

Access to services provided by The Norwalk Transit District, both fixed-route and demand-response are important to the basic life needs of many people in our service area. For fixed-route customers, employment is the most common trip purpose, followed by going to educational institutions, medical facilities, and shopping locations.

The 2022 survey, mentioned in Factor 2, reported findings of more than 80% of all bus trips were employment related. 39% of survey respondents travel between 10am to 3pm. The next busiest travel time stated was in the evening between 7pm and 12am with 26% of survey respondents saying they travel during this time.

In addition to the importance to customers of fixed-route services, demand-response customers of ADA services show similar statistics. March 2022 ridership analysis of trip purposes is as follows: 31% employment; 28% program based; 27% medical trips, 5% education, 0.6% shopping and 9% personal.

Because of the essential nature of the services and the importance of these programs in the lives of the region's residents, there is a need to ensure that language is not a barrier to access. Using the information, we gather from demographic analyses, employee experiences, community partner observations and customer comments, The Norwalk Transit District will provide the outreach necessary to ensure access is not compromised as a result of a language barrier.

Factor 4 – The resources available to the Norwalk Transit District for LEP outreach, as well as the costs associated with the outreach.

The Norwalk Transit District has always committed resources to improve access to its services and programs for LEP persons. The Spanish population has a significant presence in the service area; therefore, it has been important to offer materials in a format that are easily understood by this identified population. These have included:

- Spanish outreach materials (i.e., public notices, service explanations)
- English/Spanish on-board signage (i.e., how to use services and understand fares)
- English/Spanish brochures (i.e., farebox use and know your rights)
- English/Spanish website which includes routes and schedules
- Spanish representation at public meetings
- Language translation services
- Ongoing analysis of LEP population triennially to ensure Safe Harbor Languages are identified and translation of all documents are readily available to groups meeting a threshold of 5% of the service area population.

The costs associated with customer service are part of the on-going budget for marketing. It is expected that any additional costs might be associated with the expansion of the language assistance program, specifically the inclusion of any new LEP populations when identified will be reasonably accommodated.

The Connecticut Department of Transportation (CTDOT) launched a new initiative to develop a Customer Experience (CX) Action Plan for public transportation customers throughout the state. The CX Action Plan will be informed by customer feedback and input, and will outline future programs, policies, and investments to improve public transportation in Connecticut. A new website for the CX Action Plan – TransitCX.com.

Feedback and input will be the center of the CX Action Plan and will be used to develop priority areas and actions to improve public transportation in Connecticut. To get the maximum amount of customer feedback to inform CX Action Plan development, CTDOT has a robust community engagement plan that includes:

- A website for the initiative: TransitCX.com;
- Stakeholder interviews, community meetings, and informational town halls;
- Front-line transit employee engagement;
- Focus groups with statewide rail, bus, and paratransit/dial-a-ride customers; and
- Pop-up informational tables at bus stops, hubs, rail stations, and community events.

Language Assistance Measures

The Norwalk Transit District has reviewed the data and conclusions that have been drawn as a result of the **Four Factor Analysis.** The written and oral assistance products and methods that have been employed for over a decade for the Spanish speaking LEP population have served the Norwalk Transit District well; however, enhancements to this program would benefit other LEP populations.

From the 2019 Title VI Plan, the Norwalk Transit District successfully implemented the following:

To be in	To be in place no later than the end of FY 2021 & 2022						
Item 1	Conduct a passenger survey						
Item 2	Continued translation of vital documents						
Item 3	Conduct an organization partners survey						
Item 4	Conduct an employee survey						

These additional items to be implemented will improve how language assistance is offered by the Norwalk Transit District:

To be in place by the end of FY 2022

Item 1 Completion of new website with language translation capabilities – Soft launch in May 2022

To be in	To be in place no later than the end of FY 2025							
Item 1	Conduct a passenger survey tri-annually							
Item 2	Continued translation of vital documents							
Item 3	Conduct an organization partners survey tri-annually							

Monitoring and Updating the LEP Plan and Public Participation Process

A Norwalk Transit District Title VI Officer and support team will be charged with the responsibility of improving community engagement. This team member will ensure compliance with NTD's Title VI Plan, Public Participation Program, Language Assistance Plan, and other community outreach efforts.

Monitoring of the Language Assistance Plan will include:

- Triennial review of regional and county census data for changing patterns of LEP populations;
- Ongoing collaboration with community partners;
- Ongoing review of customer service comments and passenger interaction reports; and
- Assessment immediately following events involving public participation

Following service changes, fare increases and planning projects, NTD will assess the following questions to ensure the effectiveness of the Public Participation Plan:

- 1. Did the public know there was an opportunity to participate?
- 2. Was the purpose of the participation clearly articulated to the public?
- 3. Did the public have access to appropriate resources and information to allow for meaningful participation?
- 4. Did the decision-making process allow for consideration and incorporation of public input?
- 5. Were there complaints about the public engagement process?
- 6. Were the public engagement efforts cost effective?
- 7. What additional methods could have been employed to improve the process?
- 8. Should the Public Participation Process or Language Assistance Plan be amended?

The Norwalk Transit District LEP Plan should continue as an active planning tool. It will evolve to include new LEP populations as they are identified. The outreach to the Spanish populations has been in place for many years. Ongoing evaluation will be performed to ensure these goals are met:

- Existing language assistance measures are meeting the needs of the effected populations;
- Staff training is adequate to serve our customers; and,
- Resources are appropriate for the needs of our existing and new LEP customers.

Most of the following items related to service delivery are typically reviewed during the course of daily operations and through the review of monthly key performance indicators.

- Supervisor daily reports of passenger interactions
- Customer complaints
- Passenger Advisory Committee recommendations

- Language assistance requests (translations of documents, interpreter needs at public meetings, customer service encounters, monitoring use of translation capability on website)
- Feedback from community outreach on service responsiveness
- Feedback from customers.

A formal review of all items will be evaluated triennially unless findings indicate immediate action should be taken.

- The availability of new technologies to provide language assistance
- Review U.S. Census data updates
- Industry Best practices

Evaluations will not be limited to those items noted above but will serve as a foundation for reviewing the effectiveness of service delivery to customers with limited English proficiency.

Providing Notice to LEP Persons

LEP persons are notified of free language assistance services provided by the Norwalk Transit District. Notices will be in Spanish, Portuguese, French, French Creole, Chinese, Italian, Polish, German, Greek, Russian, Japanese, Tagalog, Urdu, and Hindi.

- On-board vehicle posters
- Signage at the administrative office
- Signage at designated bus transfer stations
- Web posts

Training Employees

Staff members should know their obligation to provide meaningful access to information and services for LEP persons. An effective LEP plan includes training to ensure that staff is informed about LEP policies and procedures, and staff having contact with the public is trained to work effectively with the resources made available to them to assist LEP persons. Training is part of the orientation for new employees. Existing employees, especially those who work with the public, shall periodically take part in re-training or new training sessions to keep up to date on their responsibilities to LEP persons. Training curriculum with be based on new technology and procedures adopted by NTD. The most recent training was completed in March 2022. Through the employee survey, NTD has identified that bus operators, supervisors, dispatchers, the ADA Paratransit Specialist, administrators, and customer service staff are most likely to come into contact with LEP persons.

The following is the Language Assistance Procedure which is part of the new hire training for all new employees.

Norwalk Transit District - Language Assistance Procedure

The following procedure has been established to address the LEP population.

Limited English Proficiency (LEP)

Persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

E-mail correspondence:

A LEP customer can now contact Norwalk Transit via e-mail. An e-mail list of fourteen "Safe Harbor" languages has been created for LEP customers to request assistance for all service-related information. This list will be posted in all NTD vehicles, on our schedules and on our website. The e-mail message requests a phone number so that we can coordinate an interpreter to contact them. NTD can determine what language the customer speaks based on our return e-mail address format.

Once we receive the e-mail, we will determine the customer's language;

- If we have employees who speak that language, we will use that resource to respond to the customer's inquiry
- If we do not have employees that speak that language, we will contact Language Line Interpreting to request their interpreting services. NTD will work with the customer and Language Line Interpreting to respond to the customer's inquiry.

Phone correspondence:

When Norwalk Transit receives a call from a LEP customer we will attempt to determine what language the customer speaks.

Procedure when an interpreter is required.

The required procedure is contained in the following attachment. As of this submittal all operations personnel have been retrained and new hire training is ongoing.



DECISION MAKING BODIES

Non-Elected Committees & Councils

When the Norwalk Transit District takes on new projects or prepares to initiate/plan a service change, representative advisory committees are established made up of employees, technical advisors, advocates, transit partners, consumers, as well as citizens of the communities served in both minority and non-minority census tracts.

Decisions regarding policy, service changes, fares, capital programming and facility locations are made by a board of municipally appointed commissioners. The Norwalk Transit District Commission is composed of two members representing the City of Norwalk. Meetings are always open to the public, held at the administrative office and announced on the norwalktransit.com website.

Body	Caucasian	Latino	African American	Asian American	Native American
Norwalk					
Board of	2	0	0	0	0
Commissioners					

In addition, Transit District staff serve on boards, commissions and committees of organizations and community partners that advocate for these impacted populations. The active participation by Transit District staff on their boards and committees dates back to the 1980s.

The needs of effected populations are sometimes best articulated through the agencies they are affiliated with. Acting as liaisons, advocates share the barriers consumers face and remediation or explanation is filtered through these organizations. Transit District staff will continue to work with organizations that represent the interest of minority, low-income, limited English proficient and senior populations.

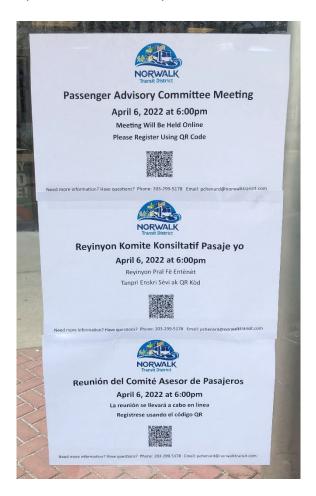
Currently, Norwalk Transit District staff is actively serving with the following organizations:

- Southwestern Region Mobility Management Steering Committee (Kennedy Center)
- Emergency Management Team (City of Norwalk)
- Norwalk Re-Development Agency (City of Norwalk)
- Western CT Council of Governments (WESTCOG)
- Mayor's Bike / Walk Commission (City of Norwalk)
- Walk Bridge Project (State of CT)
- Wall Street Neighborhood Meeting (City of Norwalk)
- Community Conversation Partnership (City of Norwalk)
- Voting Member of the Metropolitan Planning Organization
- Transportation Advisory Committee

- Connecticut Association for Community Transportation
- American Public Transportation Association
- Society of Human Resources

Passenger Advisory Committee

The Norwalk Transit District has a Passenger Advisory Committee with representation from all segments of the population served including, but not limited to, minority and low-income populations, persons with disabilities, seniors, and persons with limited English proficiency. The PAC will meet at a minimum of twice per year unless necessity dictates a special meeting led by the staff. To encourage participation on this committee, the Norwalk Transit District post notices on buses and at the WHEELS Hub. In addition, outreach will occur through advocacy agencies as noted further in this program. Below is an example of notices for our last Passenger Advisory Meeting held on April 6th, 2022, at 6:00pm.



Additional Passenger Advisory meetings were conducted as depicted below however it should be noted that participation was sparse during COVID, and a new recruitment effort will be held.

Passenger Advisory meeting conducted June 30, 2020.



TOPIC OF DISCUSSION

"Service through the pandemic! How can we improve?"

EVERYONE WELCOME TO ATTEND!

We need to people to represent all neighborhoods of Norwalk, and share their thoughts on how to improve our transportation. Call in and see how you can make a difference!

Cant make it? Submit your thoughts to us through the contact information below.

FOR MORE INFORMATION: Mabbott@Norwalktransit.com (203)-299-5178



TEMA DE DISCUSIÓN

"Servicio a través de la pandemia! ¿Como podemos mejorar?

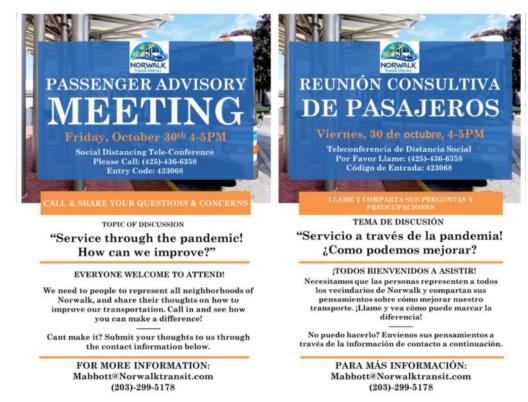
TODOS BIENVENIDOS A ASISTIR!

Necesitamos que las personas representen a todos los vecindarios de Norwalk y compartan sus pensamientos sobre cómo mejorar nuestro transporte. ¡Llame y vea cómo puede marcar la diferencia!

No puedo hacerlo? Envíenos sus pensamientos a través de la información de contacto a continuación.

> PARA MÁS INFORMACIÓN: Mabbott@Norwalktransit.com (203)-299-5178

Passenger Advisory meeting conducted October 30, 2020.



Employee Advisory Committee

All employee groups are represented in this internal committee include maintenance, administration, ADA Dispatch, Operations and Bus Operators. Meetings are held at the administrative office on an ongoing basis. The committee works towards achieving a diverse and inclusive work environment.

Body	Caucasian	Latino	African American	Asian American	Native American
Employee Advisory Committee	3	1	4	0	0

SERVICE STANDARDS & POLICIES

The Norwalk Transit District has established the following policies and standards as guidelines to assure the equitable distribution of services and the accessibility of the fixed-route services.

These service standards and policies include:

- Vehicle Load
- Headways (Frequencies)
- On-time Performance (Schedule Adherence)
- Service Availability
- Vehicle Assignment Policy
- Transit Amenity Policy

Vehicle Assignment & Age of Vehicles

Buses are assigned on a random basis with no specific route assignment based on the age of the vehicle. The only vehicle requirement as related to a service is that which is associated with capacity. Routes having the greatest ridership are assigned vehicles with an adequate passenger capacity. The average vehicle age of the fleet is 5.52 years.

Roster of Fixed Route Service Equipment

Vehicle Count	Year of Manufacture	Manufacturer	Seating Capacity	Standing Capacity	Total Capacity
1	2010	29' GILLIG	23	22	45
2	2010	35' GILLIG LF	30	22	52
1	2010	40' GILLIG LF	38	23	61
2	2014	40' New Flyer	38	23	61
12	2015	29' GILLIG LF	23	22	45
1	2019	40' GILLIG LF	38	23	61
7	2019	35' GILLIG LF	31	23	54
9	2021	35' GILLIG LF	31	23	54
1	2021	29' GILLIG LF	23	22	45

Vehicle Load

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle. The average load on the local fixed-route service within Norwalk is .68, although during peak periods it may go as high as 1.7. Commuter shuttles average 1.7, however these loads must be maintained due to highway restrictions on standees. Regional services, specifically the Coastal Link, average .70.

Maximum Vehicle loads were calculated by dividing the total seated and standing capacity by the seated capacity of the vehicle.

Vehicle Load – Local Fixed Route

Vehicle Type	_	Standing Capacity	Total Capacity	Average Load	Maximum Load
35' GILLIG	30	22	52	.68	1.7

Vehicle Load – Commuter Shuttle

Vehicle	Seating	Standing	Total	Average	Maximum
Type	Capacity	Capacity	Capacity	Load	Load
29' GILLIG	23	22	45	1.71	1.9

Vehicle Load – Coastal Link

Vehicle Type	Seating Capacity	Standing Capacity	Total Capacity	Average Load	Maximum Load
40' GILLIG	38	23	61	.70	1.61
40' New Flyer	38	23	61	.70	1.61

Vehicle Headways (Frequencies)

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. For the convenience of the riding public within the City of Norwalk it is The Norwalk Transit District's policy to maintain uniform headways of 20, 40 or 60 minutes depending upon the time of day or day of the week.

To accommodate peak period demands on the busiest routes, an additional "tripper" bus runs ahead of the regular bus so that the wait for transferring passengers is kept to a minimum.

Commuter services are completely dependent upon rail schedules and therefore have varying headways.

On-Time Performance

On-time performance is a measure of runs completed according to printed schedules. Among the most important service standard for customers is adherence to published schedules. A vehicle is considered on time if it departs a scheduled time point no more than two minutes early and no more than five minutes late. On-time performance is defined as meeting the average criteria of 90 percent or greater of all runs. Our current on-time performance is under a corrective review plan. All new vehicles are equipped with Automatic Vehicle Locating systems which enable detailed and real-time monitoring of on-time performance.

Transit Access

Bus service is intended to be provided within a five-minute walk of 80% of Norwalk's residents. Bus service is provided within a five-minute walk of over 95% of Norwalk's minority/low-income population and within a five-minute walk of 75% of Norwalk's non-minority population.

Service is provided within a five-minute walk of virtually all businesses, professional offices, and public buildings in Norwalk.

The service in Westport has a distinctive character, it is commuter-oriented service that is ondemand using a phone-based application to summon the bus and transports a passenger door to door.

After assessing the average performance for each route in the transit system, it has been determined that the service to minority and low-income areas is consistent with The Norwalk Transit District's service policies and standards.

Distribution of Transit Amenities

Bus Shelters & Bus Stop Signs

Bus shelters and bus stop signs are located throughout Norwalk's fixed route system. The location and status of all shelters, bus stop signs and Info Posts are monitored by the Maintenance and Facilities Department. Inspections are done on a routine basis.

Bus Shelters

Many shelters were located and installed over 30 years ago. There are currently 31 shelters located in Norwalk. Twenty-three of these are owned and maintained by Signal Outdoor Advertising (SOA); by agreement two additional shelters are maintained by SOA. One is owned and maintained by Metro North Railroad, four are owned by, and two are maintained by, The Norwalk Transit District. Norwalk Community College, Norwalk Public Schools, and Norwalk Hospital each maintain one shelter.

Site selection is a joint decision of The Norwalk Transit District, Signal Outdoor Advertising, and

the city of Norwalk. Final approval of all bus shelters requires final approval by City of Norwalk Planning and Zoning. Shelters are located in high travel zones throughout the City and near senior housing complexes and other high-density developments. Consideration of locations is based on ridership analyses, as well as the ability to safely board and alight passengers. The District operates a flag down system in many parts of its service area making shelter locations based on definitive quantitative ridership difficult at one specific stop. However, for the purpose of an identified quantifiable rationale for the distribution of transit amenities NTD utilizes 40 boardings per day before a stop may become considered eligible for the placement of a bench, or shelter. In conjunction with quantitative ridership the district will reference industry standards (TCRP Report 19) with consideration of permitting and for local and special needs. The installation of new bus amenities can be requested through the customer inquiry through the "Suggest it" form on NTD's website or at public meetings.

The Norwalk Transit District is working with TOD developers in the area to ensure shelters are a component of new residential developments. The Transit Agency is working with SOA to site and construct additional shelters.

The party responsible for maintenance of each shelter ensures that graffiti is removed timely, trash is collected, and damage is repaired as quickly as possible. Typically, damage is corrected within a week.

Benches

All shelters include bench seating, with the exception of two. Notably, bus shelter benches are provided at the downtown Hub (transfer point) in Norwalk and in shelters in front of the senior housing developments in Norwalk and Westport.

Bus Stop Signs & Info Posts

Signs are located at major boarding locations throughout the WHEELS system and on Routes 3, 9, 10 and 11 (routes serving minority/low-income census tracts) in Norwalk. In Westport signs are installed only at the rail stations. System-wide, passengers may hail a bus to stop for boarding.

The Norwalk Transit District also has Info Posts throughout the system; these weather-protected signs provide schedule information specific to the routes on which they are located. Bus stop signs and Info Posts are maintained by The Norwalk Transit District's Maintenance and Facilities Department.

Monitoring Service Standards

Monitoring of the service standards is integral to operational planning. The age of the vehicles is part of capital planning which is evaluated annually. Vehicle loads are measured semi-annually. Service accessibility and transit amenities are part of the on-going annual planning activities. Headways relate to the ability to maintain a schedule and on-time which is monitored

daily.

The ability to measure the success towards these standards at a more accurate level is being realized with the installation of the Automated Vehicle Location (AVL) system and will improve with the certification of our Automatic Passenger Counters (APC).

With the installation of our AVL technology and real-time bus arrival information for passengers, on-time performance is monitored daily by operations staff throughout the day. Such technology enables better supervisory oversite of routes and specific bus stop locations. Operations continuously works with bus operators to maintain on-time performance in accordance with policy standards.

Norwalk Transit continues to improve the customer experience with its passenger friendly My Stop app, providing passengers with real-time bus arrival and location information along with a quick and easy customer comment feature built into the app. The ability for customers to submit comments directly through the MyStop app, allows Norwalk Transit to better understand the public's transit riding experience and to take quick action should the customer have a subpar experience.

PROGRAM SPECIFIC REQUIREMENTS

Title VI Monitoring

Because NTD operates fewer than 50 buses in peak service, some service standards are not monitored as part of NTD's Title VI Program.

Sub-recipient Compliance

During this report period, The Norwalk Transit District did not engage any sub-recipients.

Equity Analysis for Facility

During the past three years, The Norwalk Transit District has not constructed a vehicle storage, operations, or maintenance facility.

Demographic Service Profile

The Norwalk Transit District operates fewer than 50 vehicles in peak fixed-route service; therefore, a demographic profile was not prepared for this plan update.

ENVIRONMENTAL JUSTICE

Introduction

The Norwalk Transit District, as a recipient of federal assistance, must abide by nondiscrimination policies as expressed in Title VI of the Civil Rights Act of 1964. These requirements were further enhanced by Presidential Executive Order No. 12898 issued February 11, 1994. This order directed all recipients of federal assistance to incorporate environmental justice as part of their mission by identifying and addressing the effects of all programs, policies and activities on minority and low-income populations. The Norwalk Transit District will use the following fundamental principles when planning new services or revising existing services; when operating and administrative policies are reviewed; and, when construction of fixed facilities are contemplated or are in progress:

- Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process;
- 2. Prevent the denial of, reduction in or significant delay in the receipt of benefits by minority and low-income populations; and,
- 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.

In accordance with U. S. Department of Transportation's Order to Address Environmental Justice in Minority and Low-Income Populations, all services, policies, and projects must be analyzed to determine whether there would be a "disproportionately high and adverse effect on minority and low-income populations." For the effect to be determined as "disproportionately high and adverse" it must be borne or will be suffered by a minority or low-income population appreciably more or greater in magnitude than would be suffered by the non-minority or non-low-income population.

Incorporating Environmental Justice into Planning

Environmental justice practices are incorporated into the overall commitment of the Norwalk Transit District to provide its services and benefits equitably. Thus, specific steps are followed by when conducting a service change, planning study or construction project.

The major steps in this process include:

- Identification of the study area;
- Compilation of population characteristics and identification of locations with populations of concern for environmental justice;
- Conducting public outreach;
- Identifying adverse effects on populations of concern; and,

Evaluating the project's overall effects.

Fixed-Facility/Construction Projects

Construction projects possess unique issues that may be of particular importance to low-income and minority populations and should be considered as part of the assessment:

- Human health and quality of life effects related to construction and construction truck traffic off-site;
- Continued availability of community facilities, services and open space;
- Preservation/enhancement of community character and cohesion;
- Direct and indirect residential and business displacements arising from secondary development or change in community character; and,
- Economic vitality and job opportunities.

Data Collection

The WestCOG Regional Planning Agency has prepared a demographic overview of Connecticut's Southwestern region using 2019 U. S. Census data with identification of:

- Geographic distribution of populations of concern;
- Communities of concern;
- Travel characteristics of the population in communities of concern;
- Implications of travel characteristics; and,
- Linguistically isolated households.

This data, as well as the detailed Tables referenced throughout this Title VI Assessment, provide the baseline for the evaluation of environmental impacts to a population and the community. The public participation plan details the process followed by the Norwalk Transit District to afford opportunity for inclusion by all impacted groups and stakeholders.

The Norwalk Transit District will follow federal guidance provided in FTA Circular 4703.1 Environmental Justice Policy Guidance for FTA Recipients (August 2012).

CONTACT

For additional information on the Norwalk Transit District's Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Attn: Civil Rights Officer Norwalk Transit District 275 Wilson Avenue Norwalk, Connecticut 06854 Telephone: (203)-852-0000

Fax: (203)-299-5166

Email: titlevi@norwalktransit.com

BOARD ADOPTION OF POLICY



Commissioners David L. Jaeger, Jr., Alice McQuaid, Esq. Chief Executive Officer Kimberlee A. Morton

> 275 Wilson Avenue, Norwalk, CT 06854-4615 Tel: (203) 852-0000 Fax: (203) 299-5166 www.norwalktransit.com

AUTHORIZING RESOLUTION

As duly authorized and action Commissioners of the Norwalk Transit District, we hereby resolve to adopt the Norwalk Transit District's 2022 Title VI Civil Rights Program Update.

David L. Jaeger, Jr. Commissioner

Norwalk Transit District

Alice McQuaid, Esq.

Commissioner

Norwalk Transit District

DATE:

May 26, 2022

CERTIFICATION

The undersigned duly qualified and acting Secretary of the Norwalk Transit District certifies that the foregoing resolution was adopted at a legally convened meeting of the Norwalk transit District held on May 26, 2022 at 6:00pm.

Kimberlee A. Morton Chief Executive Officer

Norwalk Transit District