



CITY OF STAMFORD

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P.O. BOX 10152

STAMFORD, CONNECTICUT 06904-2152

CITY OF STAMFORD, CONNECTICUT

TITLE VI PROGRAM

FEBRUARY 2020

Subject to revision pending FTA
approval

CITY OF STAMFORD, CONNECTICUT TITLE VI PROGRAM

Introduction

Title VI is a Federal statute which provides that no person 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. As a recipient of funding from the U.S. Department of Transportation Federal Transit Administration, the City of Stamford has developed this program to ensure that its transit related projects and services are consistent with the Title VI requirements.

Title VI Policy Statement

The City of Stamford is committed to ensuring that no person is excluded from participation, denied benefits, or otherwise subjected to discrimination under any program or activity, on the basis of race, color, or national origin.

Notice to the Public of Protection

The document on the following page, titled “Your Rights Under the Civil Rights Act of 1964” will be posted at several locations throughout the City including in public areas within the Government Center, on fixed route shuttle buses operated by a subcontractor, at the offices of the subcontractor, and on the City’s and contractor’s websites. This notification will be posted in English, Spanish, Polish and Haitian. The complaint forms also included in this Plan will be available in the same languages.



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

Title VI of the Civil Rights Act of 1964 provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance”.

The City of Stamford is committed to ensuring that no person is excluded from participation, denied benefits, or otherwise subjected to discrimination under any program or activity, on the basis of race, color, or national origin.

The City of Stamford, 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 City of Stamford programs and activities.

The City of Stamford 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 City of Stamford's Title VI Program.

Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color, or national origin may file a Title VI complaint. To request additional information on City of Stamford's non-discrimination obligations or to file a Title VI complaint, please submit your request in writing to:

Director of Human Resources
City of Stamford
888 Washington Boulevard
Stamford, CT 06901 (203) 977-4070

Written complaints must be signed by the complainant or a representative and should include the complainant's name, address, and contact information. Describe how, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses. Also include any other information you deem significant. Complaints must be filed within one hundred eighty (180) days of the date of the alleged discriminatory act.

Complaint forms are available online at www.stamfordct.gov

Complaints may also be filed directly to:

Federal Transit Administration Office of Civil Rights
55 Broadway, Suite 920
Cambridge, MA 02142-1093



Sus derechos conforme al Título VI de la Ley de Derechos Civiles de 1964

El Título VI de la Ley de Derechos Civiles de 1964 (Title VI of the Civil Rights Act of 1964) dispone que “no se excluirá a ninguna persona en los Estados Unidos de participar en ningún programa o actividad que reciba ayuda financiera federal, ni se le negarán los beneficios de estos, ni será objeto de discriminación debido a su raza, color o nacionalidad en ninguno de ellos.”

La Ciudad de Stamford asume el compromiso de garantizar que no se excluya a ninguna persona de participar en ningún programa o actividad, ni se le nieguen los beneficios de estos, ni sea de otro modo objeto de discriminación en ellos debido a su raza, color o nacionalidad.

La Ciudad de Stamford, como beneficiaria de ayuda financiera federal, garantizará el pleno cumplimiento del Título VI de la Ley de Derechos Civiles de 1964 y sus enmiendas, como también de los estatutos y las reglamentaciones relacionados, en todos los programas y las actividades de la Ciudad de Stamford.

La Ciudad de Stamford ofrece, sin distinción de raza, color, nacionalidad:

1. Servicios de transporte público y beneficios que están a disposición de todas las personas y se distribuyen equitativamente
2. Servicios de transporte público de nivel y calidad suficientes para brindar acceso y movilidad igualitarios a todas las personas
3. Oportunidades para participar en los procesos de planificación del transporte público y de toma de decisiones; y
4. Decisiones justas en torno a la ubicación de los servicios y las instalaciones de transporte público

Estos objetivos constituyen la base del Programa del Título VI de la Ciudad de Stamford.

Toda persona que crea haber sido objeto de discriminación o represalias debido a su raza, color, nacionalidad puede presentar una denuncia conforme al Título VI. Si desea solicitar información adicional sobre las obligaciones de no discriminación de la Ciudad de Stamford o presentar una denuncia conforme al Título VI, envíe su solicitud por escrito a la siguiente dirección:

Director of Human Resources
City of Stamford
888 Washington Boulevard
Stamford, CT 06901 (203) 977-4070

Las denuncias presentadas por escrito deben estar firmadas por el denunciante o por su representante, y deben incluir su nombre, domicilio e información de contacto. En la denuncia, describa cómo, cuándo, dónde y por qué considera que fue objeto de discriminación. Indique la ubicación, los nombres y la información de contacto de cualquier testigo. Incluya, además, cualquier otra información que considere pertinente. Las denuncias deben presentarse dentro de los ciento ochenta (180) días posteriores a la fecha del presunto acto discriminatorio.

Los formularios de denuncia están disponibles en línea en el sitio web www.stamfordct.gov.

Las denuncias también pueden presentarse directamente ante la Oficina de Derechos Civiles (Office of Civil Rights) de la Administración Federal de Tránsito (FTA, Federal Transit Administration) a la siguiente dirección:

Federal Transit Administration Office of Civil Rights
55 Broadway, Suite 920
Cambridge, MA 02142-1093



Dwa ou Genyen nan Sizyèm Tit Ak Dwa Sivil 1964

Sizyèm Tit nan Ak Dwa Sivil 1964 la deklare “yo pakab fè okenn moun nan peyi Etazini sibi diskriminasyon sou baz ras li, koulè li, ou byen nasyonalite li, ou byen refize li patisipasyon oswa benefis nan okenn pwogram ou aktivite ki resevwa bourad lajan gouvènman federal.”

Vil Stamford pran angajman pou li asire yo pa refize moun patisipasyon oswa benefis, ou byen pou li vin sibi diskriminasyon nan okenn pwogram ou aktivite sou baz ras, koulè, ou byen peyii kote li fèt.

Vil Stamford, kòm biro ki jwenn sipò lajan gouvènman federal, li ap garanti yo respekte Sizyèm Tit nan Ak Dwa Sivil 1964 la avèk tout amandman li genyen, avèk tout lwa e règleman ki asosye avèk li nan tout pwogram e aktivite nan Vil Stamford.

Vil Stamford ofri, san konsiderasyon ras, koulè, oswa nasyonalite:

1. sèvis e benefis transpò ki disponib e ki distribye nan yon fason ki pa gen patipri;
2. ase nivèl e kalite nan sèvis transpò yo pou yo kab bay aksè ki egal pou tout moun e ki ofri mobilite pou tout moun;
3. opòtinite pou moun patisipe nan planifikasyon transpò e jan yo pran desizyon yo; e
4. desizyon ki jis sou plasman sèvis e batiman transpò yo.

Objektif sa yo fè baz Pwogram sou Sizyèm Tit Vil Stamford la genyen.

Nenpòt moun, fi ou gason, ki kwè li te sibi diskriminasyon ou byen represay sou baz ras li, koulè li ou byen peyi kote li fèt, gen dwa denonse sa sou Sizyèm Tit la. Pou enfòmasyon adisyonel son obligasyon Vil Stamford la kont discrimasyon ou byen pou ou pote plent, tanpri voye yon demand ekri bay:

Director of Human Resources
City of Stamford
888 Washington Boulevard
Stamford, CT 06901 (203) 977-4070

Fòk moun kab pote plent lan ou byen yon lòt moun ki reprezante li siyen e fòk dosye a gen non moun kab pote plent lan, adrès li, e enfòmasyon kontak li. Dekri kòman, kilè, kibò, e pou kisa ou kwè yo te diskrimine kont ou. Mete kote li te pase a, non e enfòmasyon kontak nenpòt temwen ki te genyen. Mete nenpòt lòt enfòmasyon ou kwè ki empòtan. Fòk ou depoze plent lan avan 180 jou aprè yo te fè ou diskriminasyon sa a.

Fòmilè pou pote plent yo disponib sou entènèt nan www.stamfordct.gov

Ou kab depoze yon plent dirèkteman nan:

Federal Transit Administration Office of Civil Rights
55 Broadway, Suite 920
Cambridge, MA 02142-1093



Twoje prawa na mocy rozdziału VI ustawy o prawach obywatelskich z 1964 roku

Rozdział VI ustawy o prawach obywatelskich z 1964 roku stanowi, że „żadna osoba w Stanach Zjednoczonych nie może otrzymać odmowy świadczeń ani nie może podlegać dyskryminacji na tle rasy, koloru skóry czy narodowości, być wykluczana z udziału w jakimkolwiek programie lub inicjatywie federalnej pomocy finansowej, podlegać dyskryminacji w związku z nimi czy uzyskać odmowy świadczeń z ich tytułu”.

Miasto Stamford stawia sobie za cel zagwarantowanie, aby żadna osoba nie została wykluczona z udziału w jakimkolwiek programie lub inicjatywie, nie odmówiono jej świadczeń z ich tytułu ani nie podlegała dyskryminacji w jakikolwiek inny sposób na tle rasy, koloru skóry czy narodowości.

Miasto Stamford, jako beneficjent federalnej pomocy finansowej, zapewni pełną zgodność z rozdziałem VI ustawy o prawach obywatelskich z 1964 r., z późniejszymi zmianami oraz z powiązаныmi z nią przepisami wykonawczymi i rozporządzeniami, we wszystkich swoich programach i inicjatywach.

Miasto Stamford zapewnia, niezależnie od rasy, koloru skóry, czy narodowości:

1. usługi i świadczenia transportowe, które są dostępne i sprawiedliwie rozdzielane;
2. poziom i jakość usług transportowych w stopniu wystarczającym do zapewnienia równoprawnego dostępu i możliwości przemieszczania się dla wszystkich;
3. możliwość udziału w planowaniu usług transportowych i procesie podejmowania decyzji;
4. słuszność decyzji co do lokalizacji usług i obiektów transportu miejskiego.

Cele takie stanowią podstawę programu miasta Stamford dotyczącego przestrzegania postanowień rozdziału VI ustawy.

Każda osoba, która uważa, że jest poddawana dyskryminacji lub odwetowi na tle rasy, koloru skóry, czy narodowości, może złożyć skargę na podstawie rozdziału VI ustawy. Aby uzyskać dodatkowe informacje na temat zobowiązań antydyskryminacyjnych miasta Stamford lub złożyć skargę na podstawie rozdziału VI ustawy, należy przesłać stosowne pismo na adres:

Director of Human Resources
City of Stamford
888 Washington Boulevard
Stamford, CT 06901 (203) 977-4070

Skargi na piśmie muszą być podpisane przez skarżącego lub jego pełnomocnika i powinny zawierać imię i nazwisko skarżącego, jego adres i dane kontaktowe. Należy opisać w jaki sposób, kiedy i gdzie doszło do aktu dyskryminacji oraz dlaczego dana osoba uważa, że była ofiarą dyskryminacji. Należy podać miejsce zdarzenia oraz imiona i nazwiska oraz dane kontaktowe ewentualnych świadków. Można też dołączyć inne informacje, które uważa się za istotne. Skargi należy składać w terminie stu osiemdziesięciu (180) dni od dnia zajścia rzekomego aktu dyskryminacji.

Formularze skargi są dostępne w Internecie pod adresem www.stamfordct.gov

Skargi można także składać bezpośrednio w:

Federal Transit Administration Office of Civil Rights
55 Broadway, Suite 920
Cambridge, MA 02142-1093

How to File a Complaint to the City of Stamford

A person with a Title VI complaint or who wishes to request additional information on the City of Stamford's non-discrimination obligations should submit a request to the Director of Human Resources using one or more of the following procedures:

1. A Title VI complaint form may be submitted in writing and must be signed by the complainant or a representative and should include the complainant's name, address, and contact information. Describe how, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses. Also include any other information you deem significant. Complaints may be sent via mail or hand delivered within one-hundred and eighty (180) days of the date of the alleged discriminatory act and shall be addressed to the Director of Human Resources, City of Stamford, 888 Washington Boulevard, Stamford, CT 06901. The complaint form is available at the City's website at stamfordct.gov.
2. A complaint may be taken verbally and must include the person's name and contact information, the date of the incident, and the identity of the person, department or service that caused the complaint. In cases where the complainant is unable or incapable of providing a written statement, the Director of Human Resources 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.
3. Provision will be made for persons with limited English proficiency. Contact the Director of Human Resources at acava@stamfordct.gov or 203-977-4073 for information.

City of Stamford Complaint Procedure

1. The person filing a complaint on the basis of discrimination based on race, color, or national origin will be informed that the complaint may be either filed directly with the FTA or the City of Stamford. It shall be the responsibility of the City of Stamford Director of Human Resources, or his/her designee, to track, investigate and document Title VI complaints.
2. If the person opts to file the complaint with the City of Stamford, the complaint will be directed by the Director of Human Resources to the appropriate department manager for a fact-finding review. The manager will prepare a written response to the complaint and submit it to the Director of Human Resources.
3. An acknowledgement of the complaint will be issued to the complainant within the (10) working days of receipt. The complainant shall be informed of the outcome within 90 days, unless the City of Stamford notifies the complainant that additional time is required for the investigation.
4. If the Director of Human Resources determines that the fact-finding review substantiated the complaint, Director of Human Resources will order corrective action be taken.
5. The person who filed the complaint will be consulted as to the adequacy of the proposed remedy. If acceptable, the matter is concluded.
6. If the proposed remedy is not acceptable, the person who filed the complaint may appeal and request a hearing for purposes of stating their complaint and identifying an appropriate remedy.

7. The Director of Human Resources will issue a response and recommend a remedy within ten days of the hearing.
8. If acceptable, the matter is concluded. If not, the person is again advised of the appropriate steps to appeal the complaint with the FTA.
9. The Director of Human Resources shall maintain the files and records of the City of Stamford relating to the complaints filed verbal and written for a period of three years.

Requests for this document in alternate format or assistance in preparing a complaint may be directed to Director of Human Resources at acava@stamfordct.gov, or by phone at 203-977-4073.



CONFIDENTIAL

City of Stamford
TITLE VI DISCRIMINATION COMPLAINT FORM

***Fill out, print, and send the form to the City of Stamford Director of Human Resources,
888 Washington Boulevard, Stamford, CT 06901. It may be scanned and sent to acava@stamfordct.gov
Please keep a copy of this form and any material you submit for your records.***

Name(s) _____

Street Address/Apt # _____

City, State, Zip Code _____

Phone Number(s) _____

Discrimination on the basis of: ___ Race ___ Color ___ National Origin ___ Other

Please provide the date(s), location(s) of the alleged discrimination:

Please provide the name(s) and title(s) of individuals that allegedly discriminated against you, if known:

Please briefly and clearly explain what happened and how you feel you were discriminated against. Include the names and contact information of any witnesses, if available:

Please attach additional sheets and other written documentation of your complaint as necessary.

I believe that the information provided on this Title VI Complaint Form is accurate.

Complainant Signature: _____

Name: _____ **Date:** _____

LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), the City of Stamford will prepare and maintain a list of any of the following that allege discrimination on the basis of race, color or national origin: active investigations conducted by entities other than the FTA, lawsuit, and complaints naming the City of Stamford. This list shall include the date that 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 City in response, or final findings related to, the investigation, lawsuit or complaint. This list shall be included in the Title VI program submitted to the FTA every three years.

The City of Stamford has not been involved in any transportation-related Title VI complaints.

PUBLIC PARTICIPATION

The City of Stamford is committed to providing multiple opportunities for all citizens to fully participate in the planning and implementation process for its transportation projects. The goal is to provide transportation facilities and services of equal level and quality for all affected populations.

The City of Stamford will carry out a fully integrated program of public information and outreach to ensure that issues raised by transit projects and services are communicated and addressed responsibly. The following strategies are used to ensure that the transportation decision-making process has full and open public participation and does not impose barriers upon low income, minority, or Limited English Proficiency (LEP) populations.

Public Presentations: Presentations to stakeholders will be publicized through a variety of media and will take place at easy accessible locations. Notice of public information meetings is posted at least seven business days in advance of the scheduled date. Announcements will be sent to neighborhood organizations, homeowner associations, and civic and business groups affected by the project. Notices are also printed in local English and Spanish language newspapers and will be posted in all shuttle vehicles. The City of Stamford also maintains a website where information relevant to transportation projects is posted with translations available in 80 languages.

Media Relations and Communications: The Project Manager will develop a strategic program media campaign to meet the print and broadcast needs of the project. Social media and internet-based news organizations will also be utilized.

Public Input and Participation: The City of Stamford will accept comments and inquiries from the public via a variety of mechanisms. Public notices will contain contact information for the appropriate Project Manager. Residents can use an app called “Fix It Stamford” to register and track questions and complaints [https://stamford.mycusthelp.com/WEBAPP/_rs/\(S\(r2muqzip5audrtbnuy0aatbt\)\)/supportHome.aspx](https://stamford.mycusthelp.com/WEBAPP/_rs/(S(r2muqzip5audrtbnuy0aatbt))/supportHome.aspx). The City maintains a Citizens Service Bureau that may be accessed by phone at (203) 977-4140.

Members of the public are encouraged to offer input at all public meetings either in person or via written comment. Means of public notification typically include flyers distributed to community centers, agendas

emailed to businesses and property owners within project limits, and City staff attending meetings of neighborhood organizations to provide information and elicit feedback.

The City of Stamford encourages participation by minority groups in its City commissions, boards, and committees. Notices are displayed on the City’s website when openings occur on City commissions, boards and committees and the public is urged to contact the Mayor’s office to submit their name and resume for consideration as an appointee. Following is a table showing the minority representation on City Committees for transportation, economic development and access.

Committee	White	Hispanic or Latino	African-American	Asian-American
Total City¹	66%	26%	15%	9%
Stamford Transit District	67%	33%	0%	0%
Economic Development Commission	75%	25%	0%	0%

¹ 2018 American Community Survey 5-Year estimate



City of Stamford, CT

Limited English Proficiency (LEP) Four-Factor Analysis

INTRODUCTION

The City of Stamford, CT has prepared this *Limited English Proficiency (LEP) Plan* in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166: Improving Access for Persons with Limited English Proficiency and Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. Its purpose is to ensure nondiscrimination with regard to transportation programs and services to persons who are not proficient in the English language. As a recipient of federal funds, The City of Stamford is required to comply with Title VI and Executive Orders 13166 and 12898.

The City of Stamford is not a direct transit service provider. The vast majority of the federal funding Stamford received for transportation was for the construction of the Stamford Urban Transitway, a 2.25 mile fixed guideway facility that connects Interstate 95 to the Stamford Intermodal Transportation Center and the Boston Post Road (Route 1). Construction was completed in 2019. The City of Stamford, as a direct recipient, agreed to administer federal funds awarded to Building & Land Technology, Inc. (BLT) [doing business as Walter Wheeler Drive SPE, LLC] for acquisition of four (4) trolley-like shuttle buses. The buses provide a fixed route shuttle service that operates between Harbor Point in Stamford's South End and the Stamford Downtown District. BLT is the service provider for this free shuttle service that began in February 2014 and receives no federal operating funds. BLT/Walter Wheeler Drive, SPE, LLC has agreed in writing to fully adopt the City of Stamford's Title VI plan.

FOUR FACTOR ANALYSIS

Pursuant to Department of Transportation (DOT) guidance, the City of Stamford will use the information obtained through a Four Factor Analysis to determine the appropriate level of services to be provided.

- 1. The number or proportion of LEP persons served or encountered in the eligible service population.**

The eligible service area is defined as the City of Stamford. According to 2015 American Community Survey, the City reports an estimated total of 118,171 residents, of which 57.25% (67,658) speak only English. After English, the most prominent languages spoken are Spanish (27,550 or 23.3% of residents), French Creole (3,676 residents or 3.1%) and Polish (2,063 residents or 1.7%). At least 1,000 residents in each of these language groups report speaking English “less than very well”, thereby meeting the FTA Safe Harbor Provision threshold.

“Safe Harbor Languages”	Total	Total who Speak English “Less Than Very Well”	Percent of Total Population
Spanish	27,550	14,066	11.9%
French Creole	3,676	1,438	1.2%%
Polish	2,552	1,082	0.9%

The vital documents to be made available in the “Safe Harbor” languages include:

- City of Stamford Title VI Policy Statement and Complaint Forms
- Notices of public hearings and/or requesting public participation
- Route schedules
- Notices informing customers of free language assistance

2. The frequency with which LEP individuals come in contact with the program, activity, or service.

Overall, Stamford is a diverse city. U.S. Census data show that approximately 27.5% of adults over 18 speak a language other than English at home. The Stamford Adult Education Program Profile for 2017 reports 10.4% (12,576) members of the adult population, 18 or older, do not speak English well. The latest report produced by Stamford Public Schools indicates seventy-five different languages are spoken in students’ homes throughout the district. ProPark, the shuttle service operator, estimates that 275 people ride the bus each day, and of those, approximately five percent, or 14 are non-English speaking.

The City of Stamford Grants Office contacted a number of community organizations that serve LEP persons including the Stamford Senior Center, Family Services, Optimus Health Care and Building One Community. Respondents indicated regular interaction with LEP persons. Most organizations hire bilingual staff and/or rely on other constituents to assist with language interpretation. Telephone interpretation services are also commonly utilized. These strategies are effective for the most part and respondents indicated they otherwise do not encounter significant barriers to serving non-English speaking clients.

The City of Stamford, BLT Inc ., and ProPark, BLT’s contracted operator, are in the process of developing a communications policy to assist shuttle bus drivers with verbal interactions with LEP communities. The drivers will maintain “I speak” cards and will receive training in their use. The drivers will also be surveyed to assess the frequency at which they have or could have contact with LEP persons. Survey results will be utilized to determine the need for and feasibility of additional outreach efforts such as on-call interpreters and printing or posting route information online in additional languages.

3. The nature and importance of the program, activity or services provided by the program.

The Harbor Point “trolley” offers complimentary shuttle service between both residential and office buildings in southern Stamford to the Stamford Transportation Center and the downtown area. The route includes stops at shopping centers, corporate centers, and the University of Connecticut Stamford branch. The service is a convenient alternative to other modes of transportation. ProPark, the fixed route operator, estimates a ridership of 265 passengers per day.

4. The resources available to recipient and costs.

The size of Stamford’s LEP population is significant, however, both Census data and past experience bear out that the majority of interactions concern Spanish and French Creole-speaking populations. The City of Stamford’s website can now be translated into 80 different languages using Google® translate: <http://www.stamfordct.gov/our-city>.

The City of Stamford uses both in-house and contracted resources to provide interpretation and translation to LEP individuals. The Title VI notices and Complaint Procedures posted on job sites, vehicles and the City’s website were professionally translated by a certified firm. Public meeting notices are translated by competent bilingual City staff and distributed to stakeholders and throughout the project area. These employees are also available during office hours and at public information meetings to provide interpretation services. Notices regarding public meetings or availability of project information are also printed in the local newspapers. The ads placed in the Spanish newspapers are translated by their own personnel. In the event that translation or interpretation is required in a language other than Spanish, the City is prepared to contract with professional on-site or telephone translation services to the extent financial resources allow.

Plan for Assisting Persons of Limited English Proficiency

The City of Stamford (City) is committed to compliance with the provisions of **Title VI of the Civil Rights Act of 1964** and related statutes, and **Executive Order 13166-Provision of Programs and Services to Limited English Proficient (LEP) Populations**.

Executive Order 13166 requires Federal agencies and those agencies receiving federal funds to examine the services they provide, identify any need for services to those with Limited English Proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening the fundamental mission of the agency. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance, such as the City, provide meaningful access to their LEP applicants and beneficiaries.

Identifying LEP individuals who need language assistance

A LEP person is one whom does not speak English as their primary language and has limited ability to read, speak, write or understand English. As stated above, Census data and past experience that Spanish and French-Creole speaking persons are the primary groups requiring language assistance in Stamford. Measures that may be taken to further identify individuals needing assistance include:

- Have a sign-up table available at public meetings where a staff member can greet participants and informally gauge the need for translation/interpretation assistance.
- Display the Census Bureau “I Speak Cards” to identify persons in need for assistance.
- Post a notice of available language assistance at public meetings to encourage LEP persons to self-identify.
- Continue to consult with other City agencies and local service providers to gauge developing LEP needs within the community.
- Post Title VI policy statements and a notice of available language assistance in shuttle buses to encourage LEP persons to self-identify and request assistance if needed.

Language Assistance Measures

The City of Stamford offers the following to resources to individuals in need of LEP services:

- The first step in assisting a LEP individual in person or via telephone is determining the language of the speaker. “I Speak Cards” will be available as a resource if needed. The City of Stamford has several staff members available during normal business hours who

speak Spanish or French-Creole, in addition to speakers of several other languages. If an appropriate interpreter cannot be located, in-house staff will be instructed to use a telephone interpretation service.

- Notices for public hearings and information sessions are published in the Legal Notice section of the local newspaper (*The Advocate*) and provided to the local Spanish language media.
- Public meeting notices are translated by competent bilingual City staff and distributed to stakeholders and throughout the project area.
- Free interpretation services will be made available upon request at public information meetings. Notice of these services will be included in the public meeting notices published and distributed to local agencies at least seven (7) days prior to the meeting.
- The City's and Stamford Public Schools' websites provides translations of information on their websites into 80 different languages.

Staff Training

ProPark will be provided with the LEP plan and will train its operators on the procedures required and services available to assist LEP individuals. They will also receive training on the use of the language identification cards and how to handle a Title VI and/or LEP complaint.

Monitoring and Updating the LEP Plan

The City of Stamford will continue to monitor the effectiveness of the LEP plan through consultation with the fixed route operators to determine the number of LEP persons encountered and whether their needs were met. We will also continue to consult with local agencies serving LEP populations and analyze records of public meetings to determine if changes in types of language assistance are needed. The LEP plan will be updated accordingly, at a minimum, in adherence with the Title VI update schedule.

Dissemination of the City of Stamford Limited English Proficiency Plan

Copies of the City's LEP Plan will be distributed to all City staff via the City's intranet and posted on the Harbor Point shuttle website at <https://www.harborpt.com/harbor-point-trolley/>. Copies in English and the identified safe harbor languages will be made available upon request and will be provided at public meetings.

Notice to LEP persons about the availability of Language Assistance

BLT and ProPark will provide free language assistance to LEP persons. Notices of the available services will be in Spanish, French Creole and Polish and will include posters on the vehicles,

notices posted at offices of community partners and notices on printed schedules and on the Harbor Point Trolley website.

Complaints

Any person or group that believes that have been discriminated against by the City of Stamford (City) may file a charge of discrimination with the US Department of Transportation Federal Highway Administration or any other such agency having authority to investigate Title VI discrimination complaints.

In addition, any person who believes the City, in its operation, is discriminatory in any way is entitled to lodge his or her complaint, with the Director of Human Resources at 203-977-4070 or in writing at Director of Human Resources, City of Stamford, 888 Washington Boulevard, Stamford, CT 06901.