Title VI of the Civil Rights Act of 1964 requires that no one be denied benefits, services, or contracts on the basis of race, color, national origin, sex, age, disability, limited English proficiency, or low-income status. As subrecipients of federal funding, Local Public Agencies (LPAs) are required to comply with Title VI, including but not limited to compliance requirements set forth by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA).

The Connecticut Department of Transportation has developed this list of frequently asked questions as a resource for LPAs to meet their Title VI requirements.

**Q1: What documents are LPAs required to prepare and/or submit to comply with Title VI?**

A1: Title VI requirement vary by federal funding source.

At a minimum, when receiving FHWA funds an LPA is required to:

* Perform all required actions under 49 C.F.R Part 21 and conform to the State DOT’s Title VI compliance procedures.
* Collect demographic data and information.
* Route Title VI complaints as directed by the State DOT.
* Submit annual signed Title VI Assurances to the State DOT and insert language from DOT Order 1050.2A into all contracts and agreements.
* Conform to the State DOT’s policies and reporting requirements in the State DOT’s Title VI Implementation Plan (LEP, complaint procedures, etc.). While the regulations do not require LPAs to have an Implementation Plan, they must be able to demonstrate how they comply with Title VI.
* Designate a responsible point of contact to coordinate Title VI efforts.

If an LPA is a recipient of FTA funds the LPA is required to, at a minimum, comply with the following requirements outlined in Chapter III of [FTA Title VI Circular 4702.1B](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf):

* Title VI Notice to the Public
* Title VI Complaint Form
* Title VI Complaint Process and Procedures
* Title VI Complaint Log
* Language Assistance Plan
* Four Factor Analysis
* Public Participation Plan
* Table depicting membership of non-elected committees and councils, broken down by race.
* Process and schedule for monitoring subrecipients
* Title VI equity analysis if recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operations center, etc.

Additional requirements may apply depending on whether the LPA is also providing transit services. Refer to the linked Circular above for information on additional requirements.

**Q2: What do we do if we receive a Title VI Complaint?**

A2: It depends. If the complaint is related to a program funded with FHWA funds, the LPA should forward the complaint to CTDOT upon receipt. If the complaint is related to a program funded with FTA funds, the LPA should follow the complaint process developed as part of its required Title VI documents.

**Q3: Our Human Resources Department handles all complaints related to employment. Does it make sense from the Title VI Coordinator to work in HR?**

A3: It is fine for the Coordinator to work in HR, but it is important to note that Title VI complaints are not the same as employment complaints. Title VI protects members of the public from discrimination on the basis of race, color, or national origin in the administration of your programs, benefits, and services.

**Q4: Do we have to include the Title VI Assurances in all our contracts?**

A4: Appendices A&E must be included in all federally funded transportation contracts. This includes prime and all subcontracts.

**Q5: Do we have to include DOT Order 1050.2A in all our contracts?**

A5: No, the DOT Order does not need to be included in your contracts, but an updated copy must be submitted annually to CTDOT.

**Q6: Can you provide resources for collecting demographic data?**

A6: Resources for the collection/analysis of demographic data include, but are not limited to:

* [American Community Survey/Census Data](https://data.census.gov/cedsci/)
* [EJ Screen](https://www.epa.gov/ejscreen)
* Including demographic data on surveys
* [CTDOT Title VI Maps](https://portal.ct.gov/DOT/PP_Bureau/Documents/Maps)

**Q7: FHWA requires we designate a Title VI Coordinator, is there a specific office where this employee should be assigned?**

A7: FHWA requires that the Title VI Coordinator have direct access to the chief elected official on Title VI related matters. This does not have to be a direct reporting relationship but due to the nature of potential Title VI complaints, the coordinator should be able to brief the CEO directly.

**Q8: Are we required to provide language assistance to individuals with Limited English Proficiency?**

A8: Yes, failure to provide language assistance to LEP populations may be considered a Title VI violation on the basis of national origin. It is expected that the LPA will have tools in place to provide on demand language assistance and honor any reasonable requests for assistance.

**Q9: What are some examples of language assistance measures?**

A9: Examples of language assistance measures include but are not limited to:

* Over-the-phone interpretation services
* Translating documents
* Hiring interpreters
* Utilizing bilingual staff

Please feel free to reach out to us if you would like assistance with securing an over-the-phone interpretation service. This service will cost you nothing unless it is used.