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INTRODUCTION
Title VI of the Civil Rights Act of 1964 is a federal statute that states the following:
“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.”

As a recipient/sub-recipient of federal funding, the Town of Somers, Connecticut (hereafter referred to as the TOWN) is required to prepare a Title VI Program. The following Title VI Program was developed to guide the TOWN in its administration and management of Title VI related activities.
POLICY STATEMENT
The TOWN, in accordance with Title VI of the Civil Rights Act of 1964, is committed to ensuring that no person or group(s) of persons shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by the TOWN. The TOWN shall post a Title VI Notice to the Public (Appendix A) which shall be available in languages other than English upon request.
TOWN OF SOMERS
Title VI Program

TITLE VI COORDINATOR RESPONSIBILITIES
The Title VI Coordinator is charged with the responsibility of implementing, monitoring, and ensuring the TOWN’s compliance with Title VI regulations. The TOWN’s Operations Manager shall serve in this capacity. Title VI responsibilities are as follows:

1. Coordinate and monitor the TOWN’s compliance with state and federal laws, regulations, and guidelines that prohibit discrimination on the basis of race, color, or national origin.
2. Oversee prevention efforts to avoid civil rights violations from occurring.
3. Implement the TOWN’s discrimination complaint procedures.
4. Receive, investigate, and resolve complaints alleging discrimination based on the protected classes listed above.
5. Conduct training programs on Title VI and other related statutes for the TOWN’s employees and recipients/sub-recipients of federal funds. Post a copy of the Title VI Program on the TOWN’s website. Post the VI policy statement on employee bulletin boards at the TOWN’s worksite.
6. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
7. Conduct annual Title VI reviews to monitor LEP populations and evaluate need to alter/adapt this Title VI Program should those populations increase.
LIMITED ENGLISH PROFICIENCY/LANGUAGE ASSISTANCE PLAN

Plan Purpose
The purpose of this Language Assistance Plan is to help identify reasonable steps to provide language assistance for persons who seek meaningful access person who does not speak English very well to the Town of Somers services as required by Executive Order 13166 entitled “Improving Access to Services for Persons with Limited English Proficiency.” As defined by this order, an LEP person is one who does not speak English as their primary language and who has limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

Four Factor Analysis
As required by the U.S. Department of Transportation, and in order to ensure meaningful access to programs and services, the TOWN shall use information obtained in the following Four Factor Analysis to determine the specific language services that are appropriate to provide.

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the TOWN: The TOWN will use the U.S. Census Bureau’s American Community Survey (ACS) data for limited English speaking households as it pertains to the Town of Somers and several surrounding communities to identify the number or proportion of LEP persons in the area.

<table>
<thead>
<tr>
<th>Town</th>
<th>Population 5 years and over</th>
<th>Speak only English</th>
<th>Speak a Language other than English</th>
<th>Speak English only or “very well”</th>
<th>Speak English less than “very well”</th>
</tr>
</thead>
<tbody>
<tr>
<td>Somers</td>
<td>11,216</td>
<td>88.4%</td>
<td>11.6%</td>
<td>96.5%</td>
<td>3.5%</td>
</tr>
</tbody>
</table>

At this time, there are no LEP populations that meet the LEP threshold (>5%) or the safe harbor threshold (>5% or 1000 persons).
While there is a segment of the population speaking a second language, none of these populations met the LEP or safe harbor threshold due to their ability to also speak English “very well”.

2. The frequency with which LEP persons come into contact with TOWN programs, activities, or services:
The TOWN has no record of any requests for LEP services. However, this Language Assistance Plan is being developed to meet the needs of LEP populations, should there be requests for services in the future.

3. The nature and importance of the program, activity, or service provided by the TOWN to the LEP population.
There is no significant geographic concentration of any type of LEP individuals in the TOWN’s general region at this time. However, the types of services the TOWN would potentially provide to the LEP population are of high importance. These would include all municipal services, including senior/disabled transportation.

4. The interpretation services available to the TOWN and overall cost to provide LEP assistance.
The TOWN has implemented, or will implement, the following LEP services. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least “very well”.
   a. U.S. Census Bureau’s “I Speak” language identification flashcards (Appendix B) are to be located at the TOWN offices. Staff will receive training in their proper use. The only cost associated with implementation is the cost of printing.
   b. The TOWN’s First Selectman’s Office and the Town Clerk’s Office will be familiar with and have ready access to the AltaVista Babel fish website for simple translation purposes. There is no cost associated with implementation of this strategy.
c. Should the immediate need arise for an interpreter, either in person or on the telephone, staff will first attempt to determine what language is required via “I Speak” language identification flashcards. Once determined, staff may utilize Language Line Services at http://www.languageline.com where live interpretation services are available instantaneously at a cost of $3.95 per minute.

Language Assistance Plan Implementation and Monitoring
The TOWN will implement the following:

- Regular monitoring of the LEP population via U.S. Census data. This Language Assistance plan shall be adjusted as needed in accordance with increases in the LEP population.

- All TOWN staff will receive education on the TOWN’s Title VI Program and this information will be also be part of the TOWN’s staff orientation process for new hires. Staff education will include:
  I. Understanding the Title VI Policy and LEP responsibilities
  II. Familiarity with language assistance services offered by the TOWN
  III. Use of “I Speak” language identification flashcards
  IV. Documentation of language assistance requests
  V. How to utilize AltaVista Babel fish and Language Line
  VI. How to handle a Title VI/LEP complaint

This program is designed to be flexible and is one that can be easily updated. An update shall occur every three years. Each update shall examine all plan components such as:

1. How many LEP persons were encountered?
2. Were their needs met?
3. What is the current LEP population in TOWN’s general service area?
4. Has there been a change in the types of languages where translation services are needed?
5. Have the TOWN’s available resources, such as technology, staff, and financial costs changed?
6. Were any complaints received?
PUBLIC PARTICIPATION PLAN
Public involvement is a major component of the TOWN’s planning process. The TOWN makes a concerted effort to solicit public input from all residents including under-represented groups in many aspects of TOWN planning. As of the institution of the TOWN’s Title VI program, the TOWN does not have a formal practice of outreach techniques to LEP populations due to the lack of LEP population in the service area.

However, the TOWN does implement the following strategies to allow for public participation:

- Meetings are scheduled at times and locations that are convenient and accessible for minority and LEP communities low income and ADA
- Notices for public meetings, public hearings, and other public engagement activities are posted on social media and on the TOWN’s website: www.somersct.gov
- Public Notices are posted at the Town Hall and at key locations in the community such as the Library and Senior Center
- Comments are accepted at public outreach events, by email, by mail, fax, and phone to ensure that all populations have the opportunity to participate

The following are potential options that the TOWN may incorporate if and when the need arises for LEP outreach:

- If staff will be hosting a meeting or a workshop in a location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
- When running a general public meeting notice, based on the LEP population and when relevant, staff will insert the clause that translates into “A (insert alternative language) translator will be available”. For example: “Un traductor del idioma español estará disponible.” This means “A Spanish translator will be available.”
- Key print materials will be translated and made available at TOWN offices and in communities when a specific and concentrated LEP population is identified
COMPLAINT PROCESS AND PROCEDURE
The following process and procedure and any and all related documents are available in languages other than English upon request. Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the TOWN may file a Title VI complaint by completing and submitting the Town of Somers Title VI Complaint Form (Appendix C). All complaints are tracked by the Title VI Compliance Officer via the Town of Somers complaint log (Appendix D). The TOWN investigates complaints received no more than 180 days after the alleged incident. The TOWN will process complaints that are complete. Once the complaint is received, the TOWN will review it to determine if the TOWN has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. The TOWN has 30 days to investigate the complaint. If more information is needed to resolve the case, the TOWN may contact the complainant. The complainant has 14 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 14 business days, the TOWN can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 days after the date of the letter or the LOF to do so.

In addition:
Connecticut Department of Transportation Title VI complaints may be filed directly to:
Title VI Coordinator
CT Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131-7546

Federal Transit Administration (FTA) Title VI complaints may be filed directly to:
Title VI Program Coordinator
East Building, 5th Floor, TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Town of Somers Title VI complaints may be filed directly to:
The Town of Somers
Office of the First Selectman
Title VI Program Coordinator
600 Main Street
Somers, CT 06071
NOTIFYING THE PUBLIC OF RIGHTS UNDER TITLE VI

TOWN OF SOMERS

- The Town of Somers operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Town of Somers.
- For more information on the Town of Somers civil rights program, and the procedures to file a complaint, contact 860-763-8201 or TRS at 711; email klfleur@somersct.gov or visit our administrative office at 600 Main Street, Somers, CT 06071. For more information, visit www.somersct.gov
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590 and State DOT.
- If information is needed in another language, contact 860-763-8201.
APPENDIX B: U.S. Census Bureau’s “I Speak” Language Identification Flashcard
<table>
<thead>
<tr>
<th></th>
<th>English</th>
<th>Español/Spanish</th>
<th>Shqip/Albanian</th>
<th>Amharic/Amharic</th>
<th>Arabic</th>
<th>Dá÷ñô Ý/Y/Armenian</th>
<th>Àë³ñ²/Áë³ñ²/Bengali</th>
<th>български/Бulgarian</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Hello, I’m from the U.S. Census Bureau. Is someone here now who speaks English and can help us? If not, please write your phone number and someone will contact you in English.</td>
<td>Buenos días (Buenas tardes), soy de la Oficina del Censo de los Estados Unidos. ¿Se encuentra alguien que hable inglés y pueda ayudarnos? Si no, por favor, anote su número de teléfono y alguien se comunicará con usted en español.</td>
<td>Përshëndetje, unë vij nga Zyra e Regjistrimit të Popullsisë së Sh.B.A-së. A ndodhet dikush tani këtu që flet anglisht dhe mund të na ndihmojë? Nëse jo, ju lutemi shkruani numrin e telefonit tuaj dhe dikush do t’ju kontaktojë në gjihun shqipë.</td>
<td>&quot;AU&quot;.f &amp; Y:T@]&quot; ¾Qòw qçı̄ w u=a ' ~ :: 〈&lt;” &quot; Õk=– s” s ¾T&gt; “N” K=Ç” ¾T&gt;M c’&lt; -K; ŶK?K vi-f” ¾cemi- 1Ö““ Aihn&quot; “ u&gt;T— ¾T&gt;A “O” f A . • M::</td>
<td>العربية</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Hello, I’m from the U.S. Census Bureau. Is someone here now who speaks English and can help us? If not, please write your phone number and someone will contact you in English.
Jó napot kívánok, az Egyesült Államok Népszámlálási Hivatalától vagyok. Van a közelben valaki, aki beszél angolul, és segíteni tud nekünk? Ha nem, kérem, írja le a telefonszámát, és kapcsolatba fogunk lépni Önnel magyarul.
Hello, this is the Census Bureau of the United States. Are there any English speakers here who can help? If not, we need your phone number so we can contact a person who speaks Korean.

こんにちは。私は米国勢調査局の係員です。こちらには英語を理解できる方がいらっしゃいますか？もしあたは、あなたの電話番号をお書きいただければ、日本語を話す係員が連絡をいたします。

안녕하세요. 저는 미국 인구조사국에서 일하고 있습니다. 영어를 사용하시는 분 중에 저희를 도와 주실 수 있는 분이 계십니까? 없으신 경우, 전화번호를 적어주시면 한국어를 할 수 있는 직원이 연락을 드릴 것입니다.

こんにちは。私は米国勢調査局の係員です。こちらには英語を理解できる方がいらっしゃいますか？もしあたは、あなたの電話番号をお書きいただければ、日本語を話す係員が連絡をいたします。

Sveiki, aš esu iš JAV Gyventojų surašymo biuro. Ar čia dabar yra kas nors, kas kalba anglų kalba ir galėtų mus padėti? Jei ne, prašome užrašyti savo telefono numerį ir su jumis susisiekti lietuvių kalba.
Hello, Ako’y galing sa U.S. Census Bureau. Mayroon ba ditong marunong magsalita ng Ingles at makakatulong sa amin ngayon? Kung wala, pakisulat ang telepono ninyo at may tatawag sa inyo sa Tagalog.

Привіт, Ми з США. Сенсес Бюро. Тут є хто володіє англійською мовою і може допомогти нам? Якщо ні, будь ласка, запишіть ваш телефонний номер і з вами зв'яжуться на українській мові.

بیلود، مین امریکی مردم شماری بیورو سے بون۔ کیا پہل کونی ایسًا شخص بے جو انگریزی بولتا بو اور بماری مدد کرسکتا بو؟ اگر نہیں، تو براہ کرم اپنا فون نمبر لکھوائی، اور کونی شکست آب سے اردو زبان مین رابط کرے گا۔


אלא, לא בק פר דני מית_Ptrסטון סטונס בירורה. לא פראנס לא ידני ומא רצון סבלישי או קנה אתונה שלון? אויב נשנה, ביוו שרוחיבה פראנס איינר סטינפהי, זמור או קרינעד ומע דק פראשטונדרום. מי יאנר או רודא יידיש.
# Town of Somers Title VI Complaint Form

## Section I:

**Name:**

**Address:**

**Telephone (Home):**

**Telephone (Work):**

**Electronic Mail Address:**

<table>
<thead>
<tr>
<th>Accessible Format Requirements?</th>
<th>Large Print</th>
<th>Audio Tape</th>
<th>TDD</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>Select one:</em></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>[ ] Large Print</td>
<td>[ ] Audio Tape</td>
<td>[ ] TDD</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td>[ ] Other</td>
<td>[ ] Large Print</td>
<td>[ ] Audio Tape</td>
<td>TDD</td>
<td></td>
</tr>
</tbody>
</table>

## Section II:

Are you filing this complaint on your own behalf?  

*Yes*  

*No*  

*If you answered "yes" to this question, go to Section III.

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party:  

*Yes*  

*No*

## Section III:

I believe the discrimination I experienced was based on (check all that apply):

[ ] Race  

[ ] Color  

[ ] National Origin  

**Date of Alleged Discrimination (Month, Day, Year):**

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

## Section IV

Have you previously filed a Title VI complaint with this agency?  

*Yes*  

*No*

## Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?  

[ ] Yes  

[ ] No

If yes, check all that apply:

[ ] Federal Agency: ____________________________
<table>
<thead>
<tr>
<th>[ ] Federal Court</th>
<th>[ ] State Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>[ ] State Court</td>
<td>[ ] Local Agency</td>
</tr>
</tbody>
</table>

Please provide information about a contact person at the agency/court where the complaint was filed.

<table>
<thead>
<tr>
<th>Name:</th>
<th>Title:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency:</td>
<td>Address:</td>
</tr>
<tr>
<td>Telephone:</td>
<td></td>
</tr>
</tbody>
</table>

**Section VI**

Name of agency complaint is against:

<table>
<thead>
<tr>
<th>Contact person:</th>
<th>Title:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Telephone number:</td>
<td></td>
</tr>
</tbody>
</table>

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

_________________________  __________________________
Signature                  Date

Please submit this form in person at the address below, or mail this form to:

Town of Somers Title VI Coordinator
600 Main Street
Somers, CT 06071

If information is needed in another language, please contact 860-763-8201.
APPENDIX D: Town of Somers Title VI Complaint Log

<table>
<thead>
<tr>
<th>TOWN OF SOMERS TITLE VI COMPLAINT LOG</th>
</tr>
</thead>
<tbody>
<tr>
<td>DATE (M/D/Y)</td>
</tr>
<tr>
<td>-------------</td>
</tr>
<tr>
<td>INVESTIGATIONS</td>
</tr>
<tr>
<td>1.</td>
</tr>
<tr>
<td>2.</td>
</tr>
<tr>
<td>3.</td>
</tr>
<tr>
<td>4.</td>
</tr>
<tr>
<td>LAWSUITS</td>
</tr>
<tr>
<td>1.</td>
</tr>
<tr>
<td>2.</td>
</tr>
<tr>
<td>3.</td>
</tr>
<tr>
<td>4.</td>
</tr>
<tr>
<td>COMPLAINTS</td>
</tr>
<tr>
<td>1.</td>
</tr>
<tr>
<td>2.</td>
</tr>
<tr>
<td>3.</td>
</tr>
<tr>
<td>4.</td>
</tr>
</tbody>
</table>