

Northeastern Connecticut Council of Governments
and the
Northeastern Connecticut Transit District

Title VI /LEP Plan

Ashford, Brooklyn, Canterbury, Chaplin, Eastford, Hampton, Killingly, Plainfield, Pomfret, Putnam, Scotland, Sterling, Thompson, Union, Voluntown and Woodstock



Approved June 2020
Updated November 2023



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Policy Statement

The Northeastern Connecticut Council of Governments (NECCOG) and the Northeastern Connecticut Transit District assure that no person shall, on the grounds of race, color, national origin or sex, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

NECCOG and NECTD further assure that every effort will be made to ensure non-discrimination in all of its programs and activities whether or not those programs and activities are federally funded. In the event NECCOG or NECTD distributes federal aid funds to another governmental entity, NECCOG or NECTD will include Title VI compliance language in all written agreements and will monitor for compliance. NECCOG's (which also serves this role for NECTD) Title VI Coordinator is responsible for initiating and monitoring Title VI activities, overseeing the preparation of required reports and overseeing other NECCOG or NECTD responsibilities as required by Title 23 CFR part 200 and Title 49 CFR part 21.

NECCOG and NECTD Title VI Coordinator

John Filchak, Executive Director
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Introduction

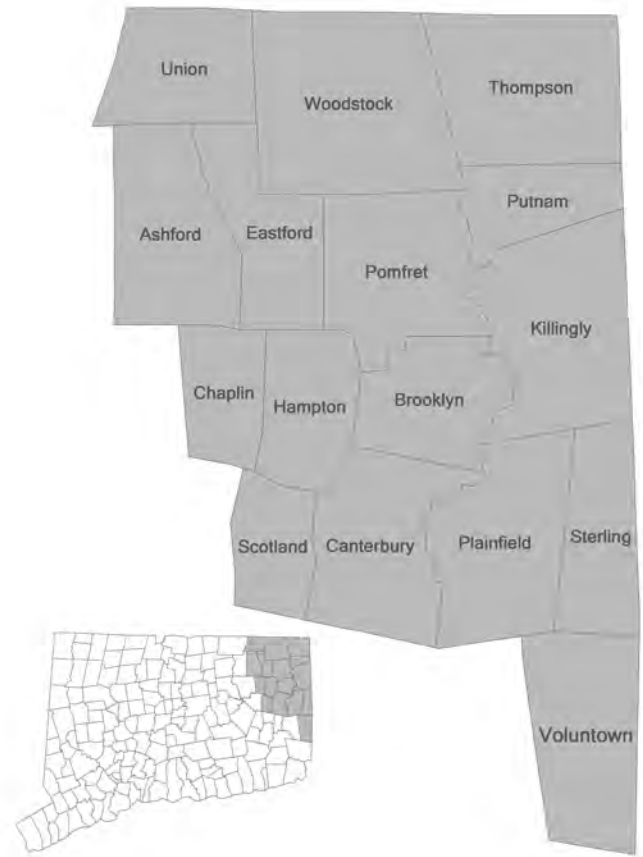
This document will serve as the Title VI Nondiscrimination Plan and the Limited English Proficiency (LEP) Plan for the Northeastern Connecticut Council of Governments (NECCOG) and the Northeastern Connecticut Transit District (NECTD), to guide NECCOG and NECTD in its administration and management of Title VI-related activities. The Limited English Proficiency (LEP) portion of the plan ensures that individuals with limited English proficiency have meaningful access to the transportation planning process, services and other programs provided or facilitated by NECCOG and NECTD.

NECCOG provides administrative services for NECTD and has done so since NECTD was founded in 1978. Given that the two organizations are operated in tandem it was decided to combine the Title VI/LEP Plan into one document to ensure consistency and understanding.

NECCOG is one of nine regional councils of governments in Connecticut and one of two rural councils. NECCOG is made up of the towns of Ashford, Brooklyn, Canterbury, Chaplin, Eastford, Hampton, Killingly, Plainfield, Pomfret, Putnam, Scotland, Sterling, Thompson, Union, Voluntown and Woodstock. The organization is a voluntary, statutorily authorized, association of local governments providing a regional forum to discuss issues of mutual interest and develop responses to common needs. NECCOG's member towns are each represented by their respective chief-elected official. NECCOG provides a range of voluntary services and programs - depending on the collective and/or individual needs of our member towns.

NECTD is one of 15 public transit districts operating in Connecticut. The District is the public transportation provider for northeastern Connecticut, available for all residents and visitors to the region. Currently, the towns of Brooklyn, Canterbury, Killingly, Putnam, Thompson, Eastford, Plainfield, Pomfret, Woodstock, and Union receive NECTD services. The District provides two types of service: deviated fixed route and dial-a-ride for elderly and disabled persons. The deviated fixed route service operates Monday - Sunday with various scheduled stops located throughout the service area. The elderly and disabled service, which provides door-to-door service, is also available seven days per week by reservation with NECTD.

Title VI of the Civil Rights Act of 1964 prohibits federal agencies and sub-recipients of federal funds from discriminating on the basis of race, color or national origin, against participants or clients of programs that receive federal funding. Succeeding laws and Presidential Executive Orders added sex, age, income status and disability to the criteria for which discrimination is prohibited. In addition to nondiscrimination, this plan provides infor-



mation relative to Presidential Executive Order 13166 which mandates that federal agencies ensure that people with Limited English Proficiency (LEP) have meaningful access to federally conducted and/or funded programs and activities. Additionally, Presidential Executive Order (Order 12898) mandates that federal agencies address equity and fairness through consideration of Environmental Justice toward low-income and minority populations.

Full Title VI Notice to the Public

The Northeastern Connecticut of Governments (NECCOG) and the Northeastern Connecticut transit District (NECTD) hereby gives public notice that it is the policy of the organization to ensure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related authorities and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which NECCOG and NECTD receives federal financial assistance. Additional protections are provided in other federal and state authorities for discrimination based on income status, limited English proficiency, religion, sex, disability, age, gender identity (as defined in paragraph 249(c)(4) of title 18, United States Code) or sexual orientation. Any person who believes they have experienced discrimination under Title VI has a right to file a formal complaint with NECCOG or NECTD. Any such complaint must be filed with NECCOG's (the same as NECTDs) Title VI Coordinator within 180 days following the date of the alleged discriminatory occurrence.

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

- Northeastern Connecticut Council of Governments
Attention: John Filchak, Executive Director and Title VI Coordinator - email: john.filchak@neccog.org - phone -860-774-1253
125 Putnam Pike, Dayville, CT 06241.
- Connecticut Department of Transportation
Attention: Debra Goss, Title VI Coordinator - email: Debra.goss@ct.gov
2800 Berlin Turnpike, Newington, Connecticut 06111
- Federal Transit Administration (FTA) Title VI complaints may be filed directly to:
FTA Office of Civil Rights
1200 New Jersey Avenue, SE - Washington, DC 20590
- Federal Highway Administration (FHWA) Title VI complaints may be filed directly to:
FHWA Office of Civil Rights
1200 New Jersey Avenue, SE, 8th Floor E81-105 - Washington, DC 20590

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Title VI and Non-Discrimination Policy Statement

NECCOG and NECTD are committed to compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related regulations and statutes. Section 601 of Title VI of the Civil Rights Act of 1964 declares it to be the policy of the United States 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”. Consistent with this policy, and in accordance with section 602 of Title VI, codified as amended at 42 U.S.C. § 2000d-1, the Department of Justice promulgated regulations prohibiting recipients of federal funds from “utilizing criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects individuals of a particular race, color, or national origin.” 28 C.F.R. § 42.104(b)(2). The United States Department of Transportation later promulgated nearly identical regulations - See 49 C.F.R. § 21.5(b) (vii) (2). Since the Civil Rights Act of 1964, other nondiscrimination laws have been enacted to expand the range and scope of Title VI coverage and applicability:

- THE UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION POLICIES ACT OF 1970 - which prohibits unfair and inequitable treatment of persons displaced or whose property will be acquired as a result of federal and federal-aid programs and projects.
- THE FEDERAL AID HIGHWAY ACT OF 1973 - which states that no person shall, on the grounds of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance under this title or carried on under this title.
- SECTION 504 OF THE REHABILITATION ACT OF 1973 - which states that no qualified disabled person shall, solely by reason of his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from federal financial assistance. This Act protects qualified individuals from discrimination based on their disability.
- THE AGE DISCRIMINATION ACT OF 1975 - which states that no person shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. This act prohibits age discrimination in Federally Assisted Programs.
- THE CIVIL RIGHTS RESTORATION ACT OF 1987, P.L.100-209 amends Title VI of the 1964 Civil Rights Act - which made it clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal assistance.
- THE AMERICAN DISABILITIES ACT (ADA) OF 1990 - which prohibits discrimination against people with disabilities in employment, transportation, public accommodation, communications, and governmental activities.
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency - which requires each federal agency to examine its programs and activities and to develop and to implement plans by which LEP persons can meaningfully access those programs and activities.
- 23 CFR PART 200 – Federal Highway Administration regulations Title VI Program and Related Statutes – which address Implementation and Review Procedures.

NECCOG and NECTD assures that no person or groups(s) of persons shall, on the grounds of race, color, sex, age, national origin, disability/ handicap, and income status, 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 NECCOG, regardless of whether those programs and activities are federally funded or not.

NECCOG and NECTD also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. In addition, NECCOG will provide meaningful access to services for persons with Limited English Proficiency.

In the event NECCOG or NECTD distributes federal-aid funds to a sub-recipient, NECCOG and NECTD will include Title VI language in all written agreements and will monitor for compliance.

NECCOG and NECTD's Title VI Coordinator - current Executive Director - is responsible for initiating and monitoring Title VI activities, preparing reports and other responsibilities as required by 23 Code of Federal Regulations (CFR) 200 and 49 CFR 21.

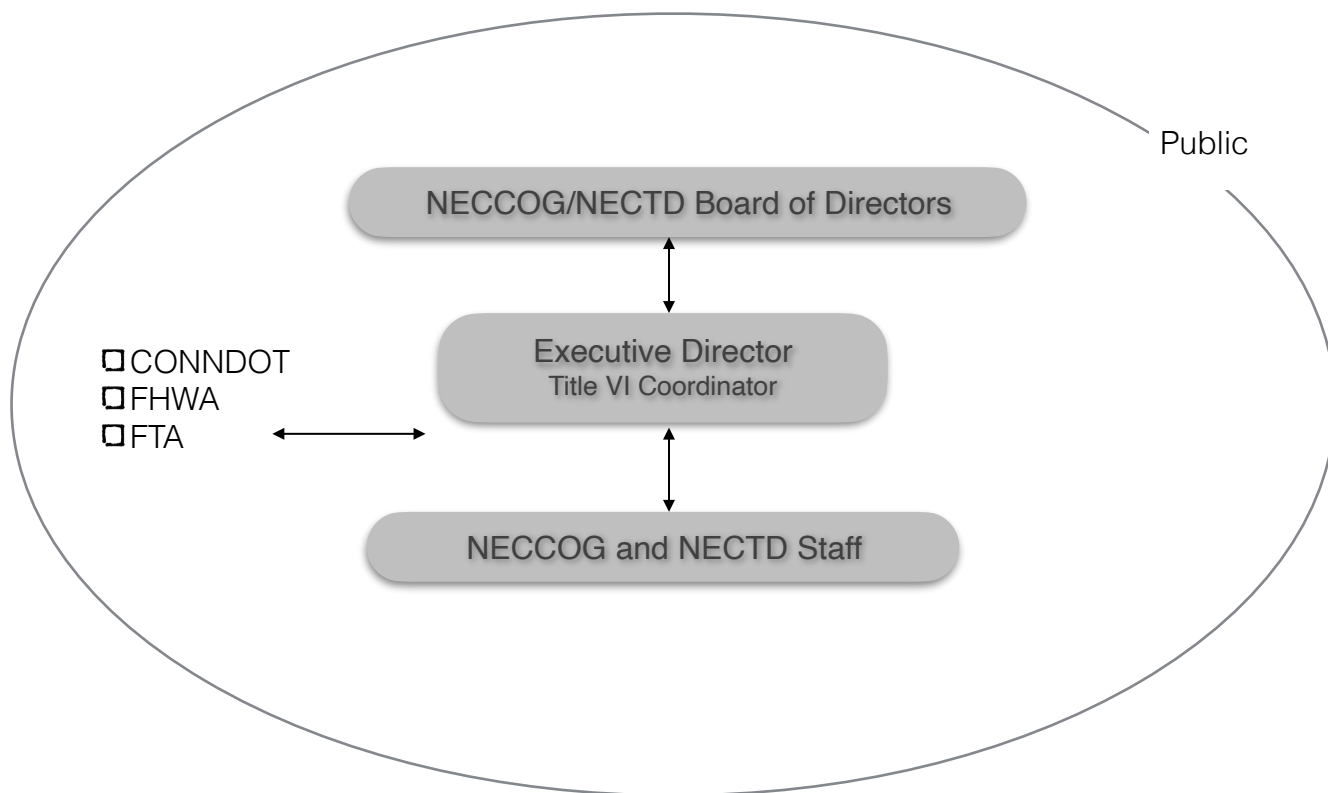
Signature

Date

John Filchak, Executive Director

Organizational Responsibilities

The general responsibility for overseeing compliance with applicable nondiscrimination authorities in each transportation planning and programming area NECCOG or NECTD is involved in resides with the Executive Director of NECCOG/NECTD. The Executive Director or his/her designees will perform the duties of the Title VI Coordinator and ensure compliance with provisions of the law, including the requirements of 23 CFR Part 200 and 49 CFR Part 21, administering the Title VI complaint procedures, and insuring compliance with Title VI by recipients, sub-grantees, contractors and sub-contractors of NECCOG or NECTD.



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Title VI Coordinator Responsibilities

The Title VI Coordinator is charged with the responsibility for implementing, monitoring, and ensuring NECCOG's compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received by NECCOG or NECTD.
2. Collect Statistical data (race, color, sex, age, disability, or national origin) of participants in and beneficiaries of state highway programs, e.g. affected citizens and impacted communities.
3. Conduct annual Title VI reviews to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of consultant contractors and other recipients of federal-aid highway fund contracts administered through the NECCOG or NECTD.
5. Review NECCOG and NECTD program directives. Where applicable, include Title VI language and related requirements.
6. Conduct training programs on Title VI and other related statutes for NECCOG and NECTD employees and recipients of federal highway funds. Post a copy of the Title VI Plan on the NECCOG and NECTD web-sites. Post the Title VI Plan on employee bulletin boards at NECCOG and NECTD worksite. Inform all employees that a copy of the Title VI Plan is available upon request. Instruct all new employees about the Title VI Plan during orientation.
7. Prepare a yearly report of Title VI accomplishments and goals, as required.
8. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English. Post the Title VI Plan on the NECCOG and NECTD web-site.
9. Conduct post-grant reviews of NECCOG and NECTD programs and applicants for compliance with Title VI requirements.
10. Identify and take corrective action to help eliminate discrimination.
11. Establish procedures to promptly resolve identified Title deficiencies. Document remedial actions agreed to be necessary. Provide remedial actions within 90 days of identification of a deficiency.

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Title VI Complaint Procedure

Complaints can originate from individuals or firms alleging inability to bid upon or obtain a contract with NECCOG for the furnishing of goods and/or services. Examples include advertising for bid proposals; pre-qualification or qualification; bid proposals and awards; selection of contractors, subcontractors, material and equipment suppliers, lessors, vendors, consultants, fee appraisers, universities, etc. Complaints can originate as a result of project impacts on individuals or groups. For example, social and economic, traffic, noise, air quality, access, accidents, and failure to maintain facilities.

NECCOG/NECTD Title VI Policy assures that no person or groups of persons shall, on the grounds of race, color, sex, age, national origin, and disability or handicap, 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 NECCOG, its recipients, sub-recipients, and contractors. In addition, Executive Order 12898 (Environmental Justice) prohibits discrimination based on income status.

NECCOG/NECTD Title VI Complaint Procedures are written to specify the process employed by the NECCOG or NECTD to investigate complaints, while ensuring due process for Complainants and Respondents. The process does not preclude the NECCOG or NECTD from attempting to informally resolve complaints.

These procedures apply to all external complaints about discrimination on the basis of race, color, national origin (including limited English proficiency), age, sex, or disability related to any program or activity administered by the NECCOG and NECTD and/or its sub-recipients, consultants and contractors, filed under Title VI of the Civil Rights Act of 1964 as amended, (including Disadvantaged Business Enterprise and Equal Employment Opportunity components); or other related laws including, but not limited to, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the Americans with Disability Act of 1990.

The NECCOG and NECTD will also use these procedures to document external complaints about discrimination or disproportionate impacts relative to sexual orientation (including lesbian, gay, bisexual, transgender), or low income status.

These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the Complainant. Intimidation or retaliation of any kind is prohibited by law.

A Complaint Log will be maintained by NECCOG and NECTD listing any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA, FHWA, CONNDOT, NECCOG, NECTD and other entities;
- Lawsuits; and
- Complaints naming NECCOG or NECTD

This list will include the date that a Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by NECCOG or NECTD in response, or final findings related to the investigation, lawsuit, or complaint.

Sample Form:

Action	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or na- tional origin)	Status	Action(s) Taken
Investiga- tions				
Lawsuits				
Complaints				

NECCOG, NECTD, CONNDOT or FHWA Division do not investigate complaints filed against themselves. Complaints should be routed in the following ways:

- All complaints are forwarded to the FHWA Headquarters Office of Civil Rights (HCR) for processing. HCR is responsible for all determinations regarding whether to accept, dismiss, or transfer Title VI complaints filed against NECCOG or NECTD of Federal financial assistance.
- NECCOG or NECTD shall be forward through CONNDOT and the Federal-aid highway oversight hierarchy until the complaint reaches HCR. If a complaint is filed with CONNDOT, then CONNDOT will forward the complaint to the State’s FHWA Division Office, which will then forward the complaint to HCR.
- When HCR decides on whether to accept, dismiss, or transfer the complaint, HCR will notify the Complainant, the FHWA Division Office, CONNDOT, and NECCOG or NECTD.

Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with NECCOG or NECTD within 180 days of from the date of the alleged discrimination. These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program or activity administered by NECCOG or NECTD. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. NECCOG and NECTD uses the following detailed, internal procedures for prompt processing of all Title VI complaints received directly by it. These procedures include but are not limited to:

1. Any person or groups of persons who believe they have been aggrieved by an unlawful discriminatory practice under Title VI may individually, or through a legally authorized representative, make and sign a complaint and file the complaint with NECCOG or NECTD. Allegations received do not have to use the key words “complaint,” “civil rights,” “discrimination,” or their near equivalents. It is sufficient if such allegations imply any form of unequal treatment in one or more of the NECCOGs or NECTDs programs for it to be considered and processed as an allegation of a discriminatory practice.
2. The complaint must be filed, in writing, no later than 180 calendar days after the date of the alleged discrimination. Person filing a Title VI complaint are encouraged, but not required, to use the NECCOG or NECTD Title VI Complaint Form.

3. Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by NECCOG or NECTD may file a Title VI complaint by completing and submitting the NECCOG or NECTD Title VI Complaint Form. NECCOG or NECTD investigates complaints received no more than 180 days after the alleged incident. NECCOG will process complaints that are complete.

Once the complaint is received, the NECCOG or NECTD will review it to determine if our office has jurisdiction. Within fourteen (14) business days, the NECCOG or NECTD shall confirm receipt of the complaint and inform the Complainant of the investigation process. NECCOG or NECTD will notify the Connecticut Department of Transportation's Title VI Coordinator of any Title VI complaints filed, within 10 business days of receipt.

In some cases, NECCOG and NECTD is required to forward complaints to either the Federal Highway Administration (FHWA) or Federal Transit Administration (FTA), or the Connecticut Department of Transportation (CONNDOT) for investigation. If your complaint is forwarded to one of these agencies, you will be provided the name and contact information of the federal employee handling your complaint.

NECCOG or NECTD has sixty (60) days to investigate the complaint. If more information is needed to resolve the case, NECCOG or NECTD may contact the complainant. The complainant has fourteen (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 fourteen (14) business days, NECCOG or NECTD can administratively close the case. A case can also be administratively closed 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 any other action will occur. If the complainant wishes to appeal the decision, she/he has [XX] days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Connecticut Department of Transportation, Office of Contract Compliance, Attn: Title VI Coordinator, 2800 Berlin Turnpike, Newington, CT 06111; or directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

4. The NECCOG or NECTD Title VI Compliance Officer will maintain a log of all complaints received by the NECCOG.

Questions and Answers for Complaints alleging Violations of Title VI of the Civil Rights Act of 1964: https://www.fhwa.dot.gov/civilrights/programs/docs/FHWA_Title_VI%20_Complaint_QA.pdf

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Title VI & Related Programs Discrimination Complaint Form

Complainant's Information:

Name:

Address:

City/State/Zip Code:

Telephone Number (Home): _____ Telephone Number (Work): _____

Person Discriminated Against (if someone other than complainant):

Name:

Address:

City/State/Zip Code: _____

Telephone Number (Home): _____ Telephone Number (Work): _____

Which of the following best describes the reason you believe the discrimination took place?

Race: _____ Color: _____ Sex: _____ National Origin: _____

Disability (for federal highway related complaints only): _____

Describe the alleged discrimination. Explain what happened and who you believe was responsible. *(if additional space is needed, add a sheet of paper).*

List names and contact information of persons who may have knowledge of the alleged discrimination.

**Have you filed this complaint with any other federal, state or local agency, or with any federal or state court?
Check all that apply.**

Federal agency _____ State agency _____ Local agency _____ Federal court _____ State court _____

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

Name: _____

Address: _____

City/State/Zip Code: _____ Telephone Number (Work): _____

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

Complainant Signature Date

Attachments: Yes _____ No _____

Submit form and any additional information to:

Title VI Coordinator
NECCOG or NECTD
125 Putnam Pike
Dayville, CT 06241
Phone: (860) 774-1253
Fax: (860) 779-2056
Email: neccogoffices@neccog.org

Limited English Proficiency Plan

Introduction

This Limited English Proficiency Plan has been prepared to address NECCOG or NECTD responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including NECCOG or NECTD which receives and administers federal grant funds.

Plan Summary

NECCOG and NECTD has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have 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.

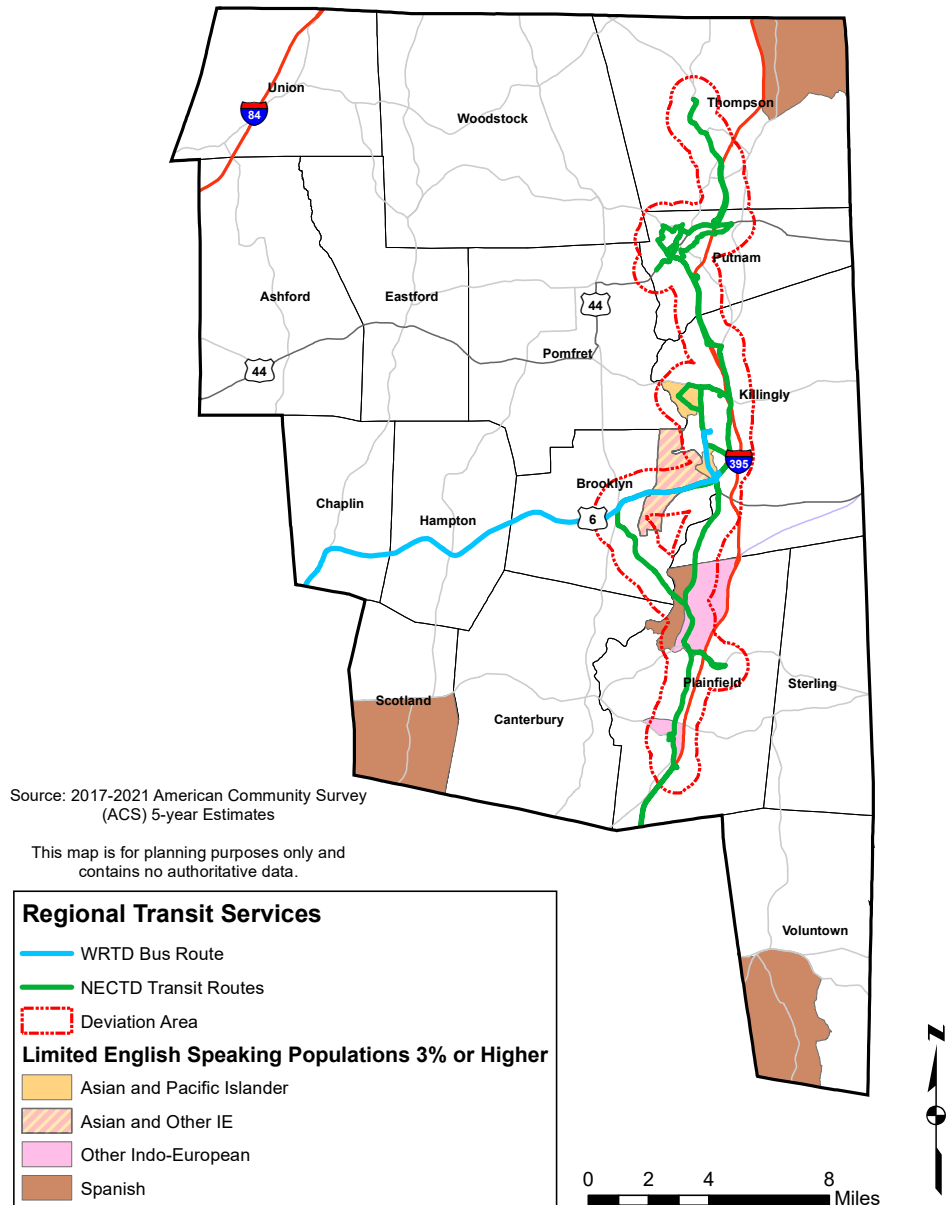
In order to prepare this plan, NECCOG and NECTD used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by the NECCOG and NECTD.
2. The frequency with which LEP persons come in contact with NECCOG or NECTD services.
3. The nature and importance of services provided by NECCOG or NECTD to the LEP population.
4. The interpretation services available to NECCOG or NECTD and overall cost to provide LEP assistance.

Meaningful Access: Four Factor Analysis

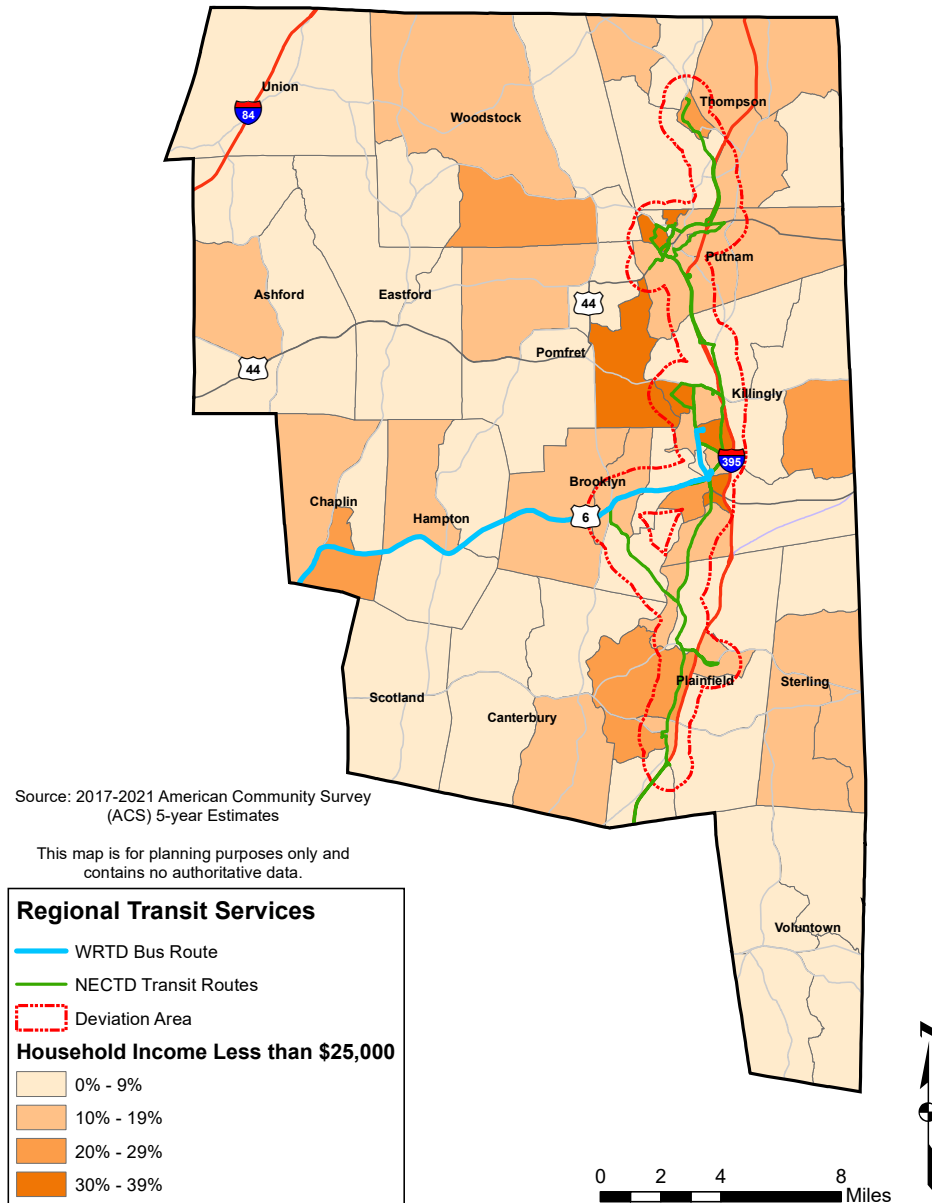
1. The number or proportion of LEP persons in the service area who may be served or are likely to require NECCOG or NECTD services. Factor 1 evaluates the number of LEP persons served and the concentration of LEP persons in the service area population. In the case of NECCOG, the service area population is the total population within the sixteen-town region served by NECCOG. Language characteristics within the region were identified using the U.S. Census Bureau's American Community Survey (ACS) data for 2017. Individuals

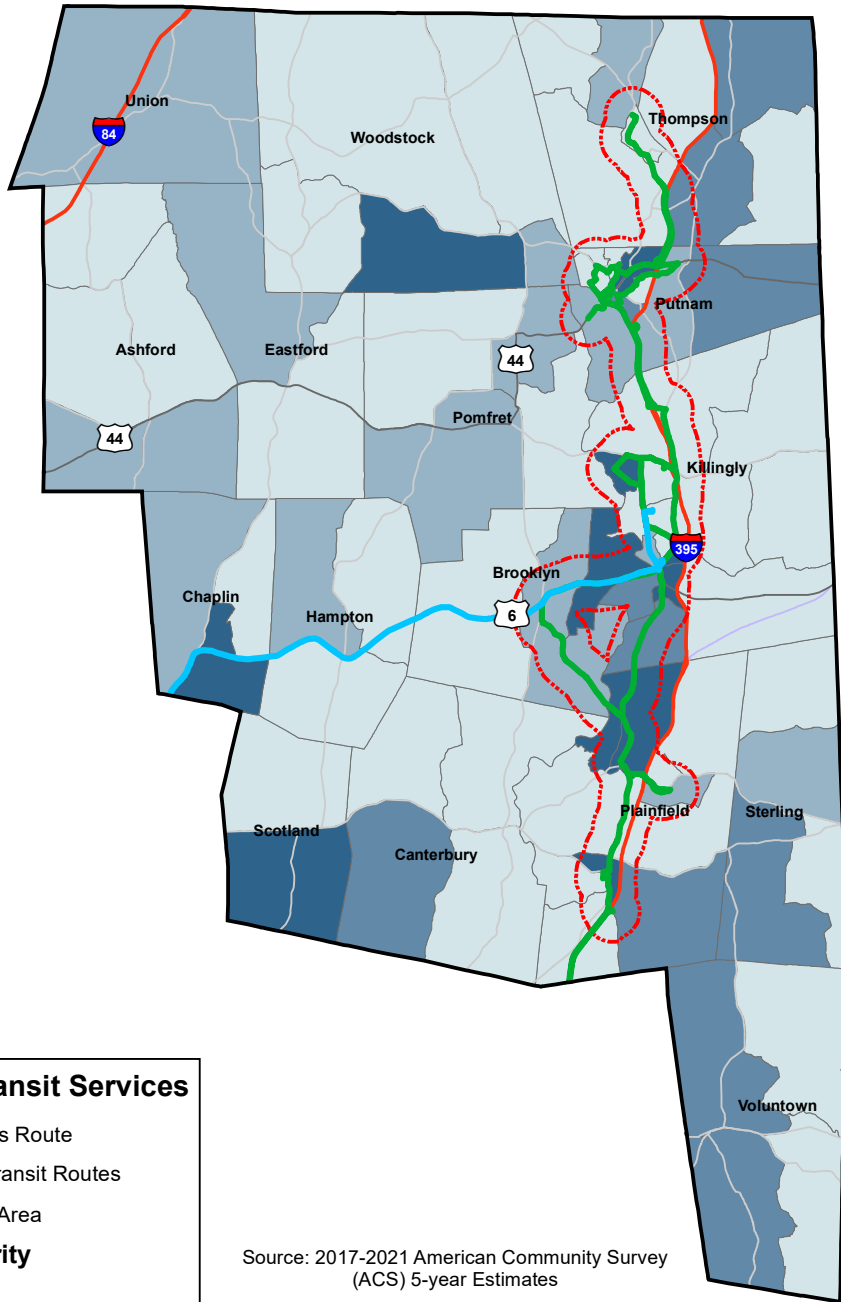
are characterized as speaking English “very well” or “less than very well.” For this analysis, an individual who speaks English less than very well is considered an LEP person. Additionally, NECCOG and NECTD examined prior experiences with LEP individuals and determine the breadth and scope of language services that are needed. The 2017 The data reveals that at the regional level, while there are numerous languages spoken at home, there is a now (first time) a significant number of persons in the region which reports speaking English



“less than very well”. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the population to be served) the sub-recipient (NECCOG) must provide written translation of vital documents for the non-English users. In the NECCOG and NECTD region, Safe harbor languages include speakers of Spanish and Other Indo-European Languages. Because the cost of providing translations for all potential Indo-European Languages safe harbor lan-

guages is prohibitive, NECCOG is focusing its resources on Spanish.





Regional Transit Services

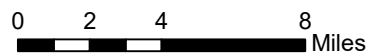
- WRTD Bus Route
- NECTD Transit Routes
- Deviation Area

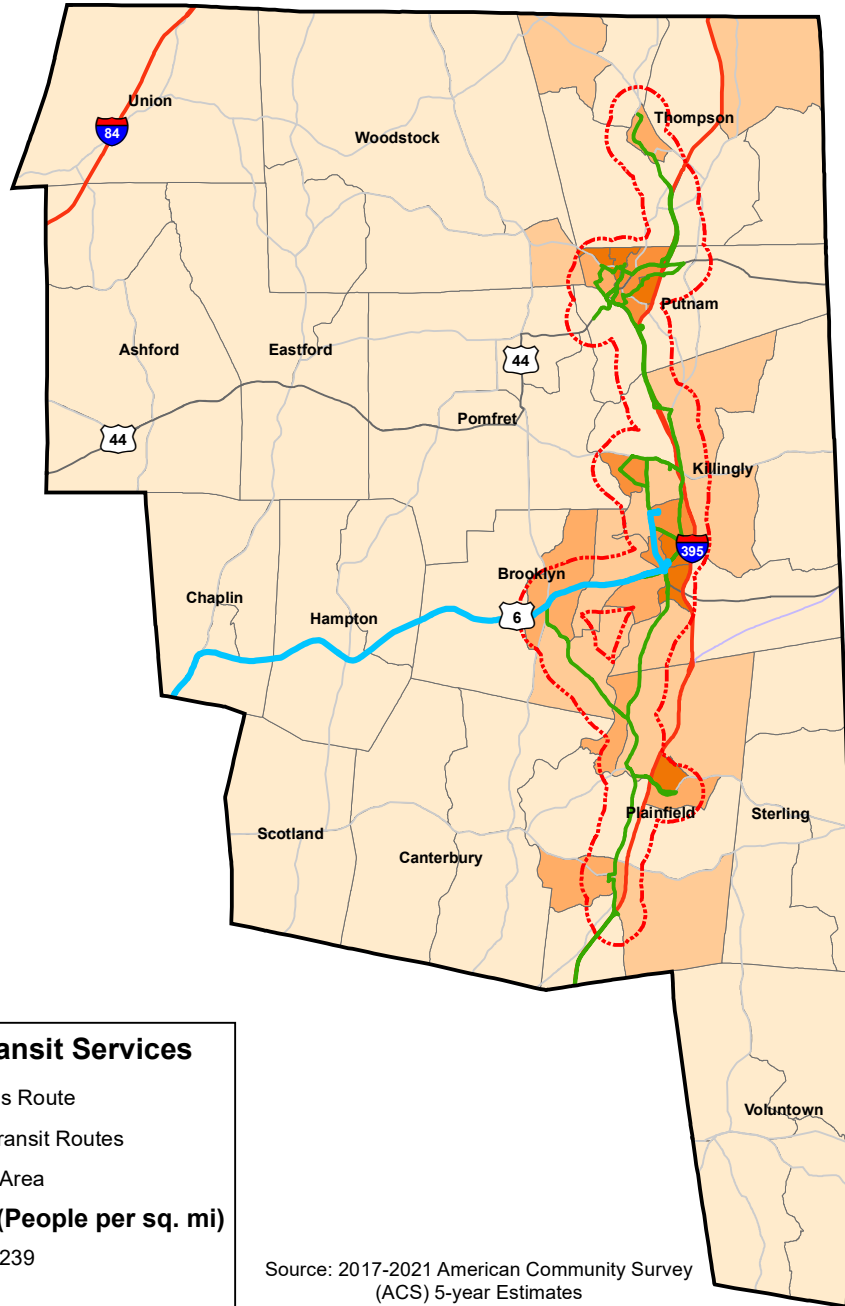
Percent Minority

- 0% - 7%
- 8% - 12%
- 13% - 19%
- 20% - 31%

Source: 2017-2021 American Community Survey (ACS) 5-year Estimates

This map is for planning purposes only and contains no authoritative data.





Regional Transit Services

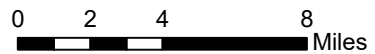
- WRTD Bus Route
- NECTD Transit Routes
- Deviation Area

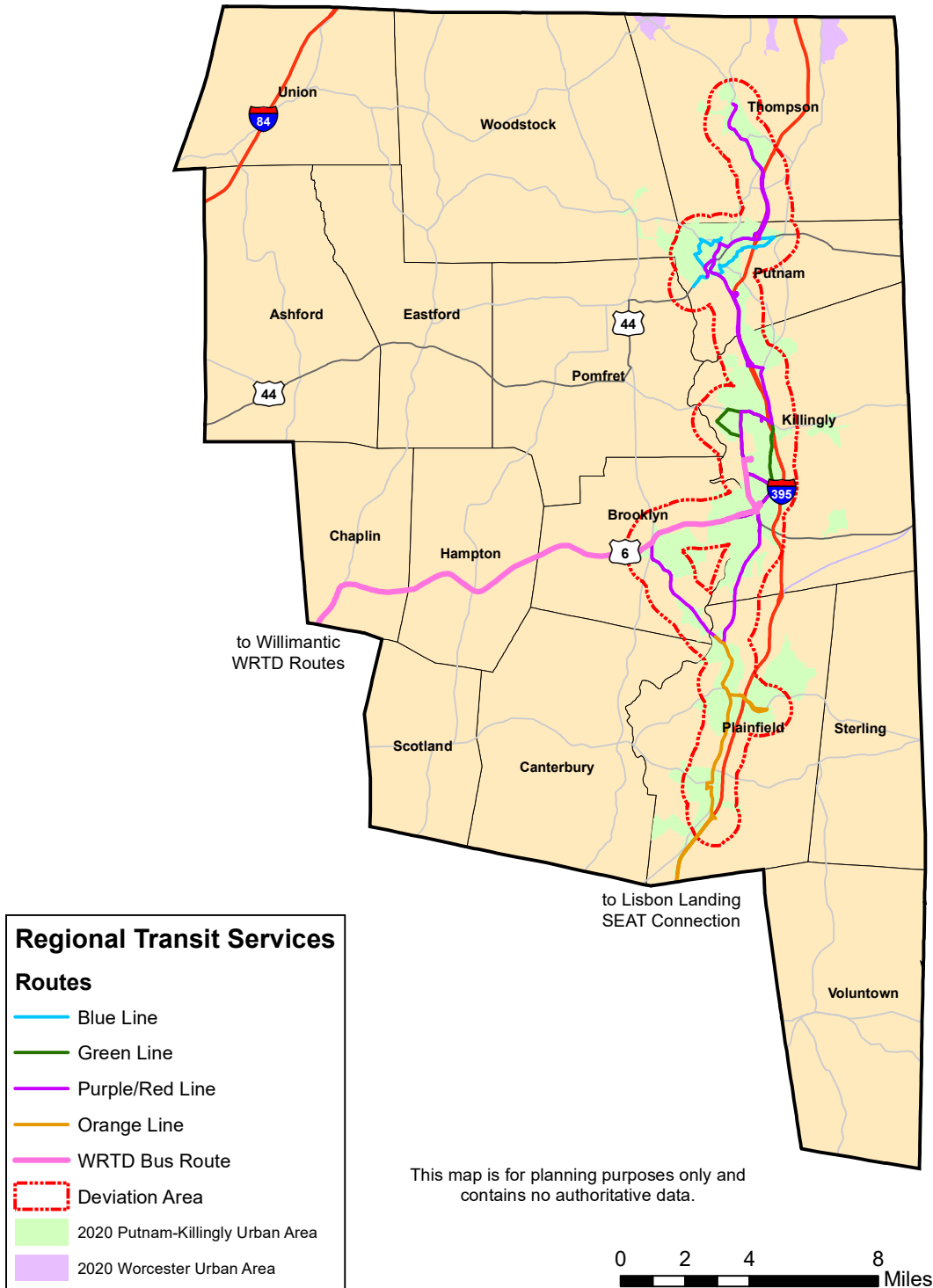
Pop. Density (People per sq. mi)

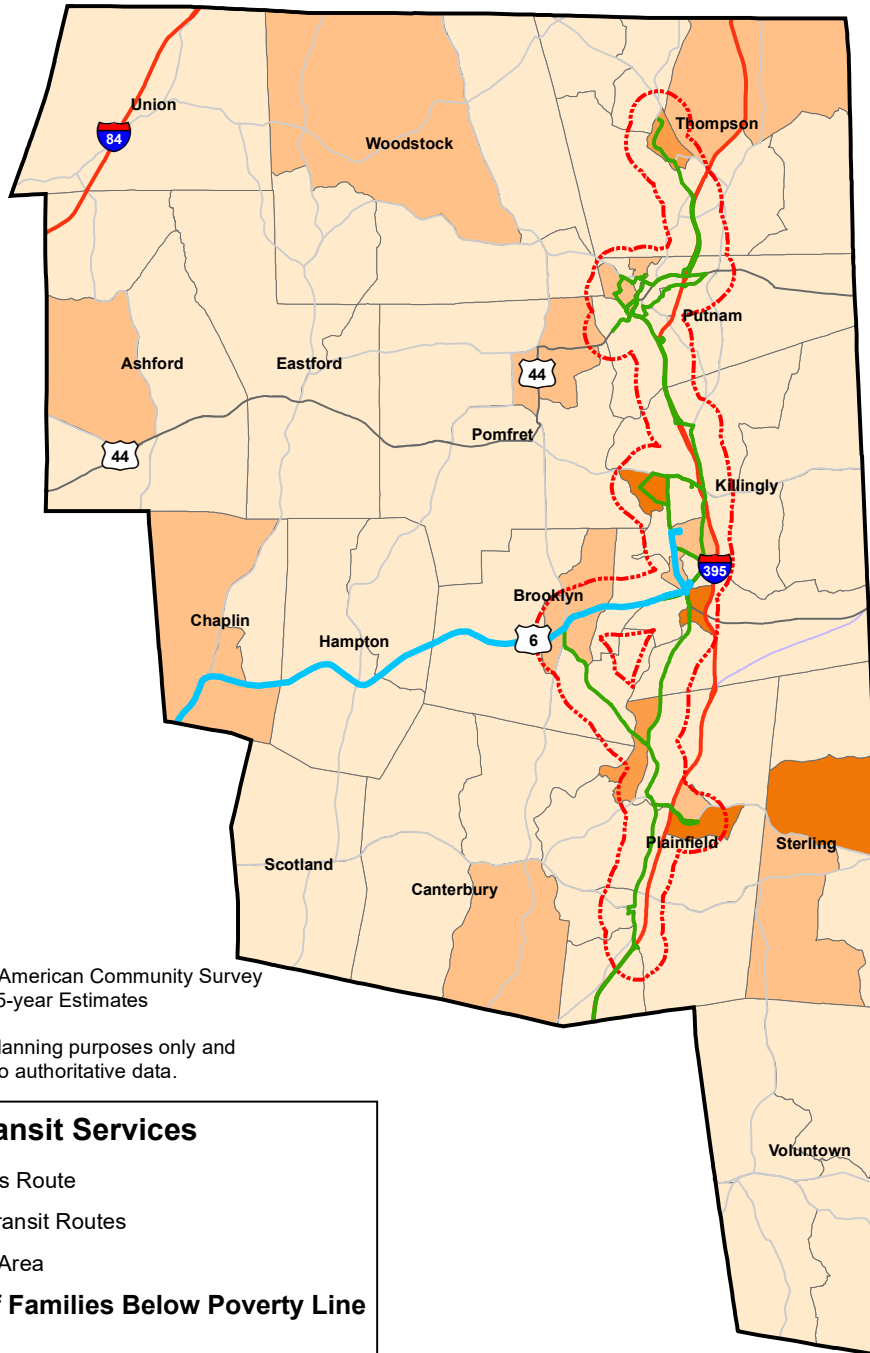
- Low: 30 - 239
- 240 - 599
- 600 - 1349
- 1350 - 2419
- High: 2420 - 4455

Source: 2017-2021 American Community Survey (ACS) 5-year Estimates

This map is for planning purposes only and contains no authoritative data.







Source: 2017-2021 American Community Survey (ACS) 5-year Estimates

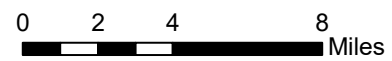
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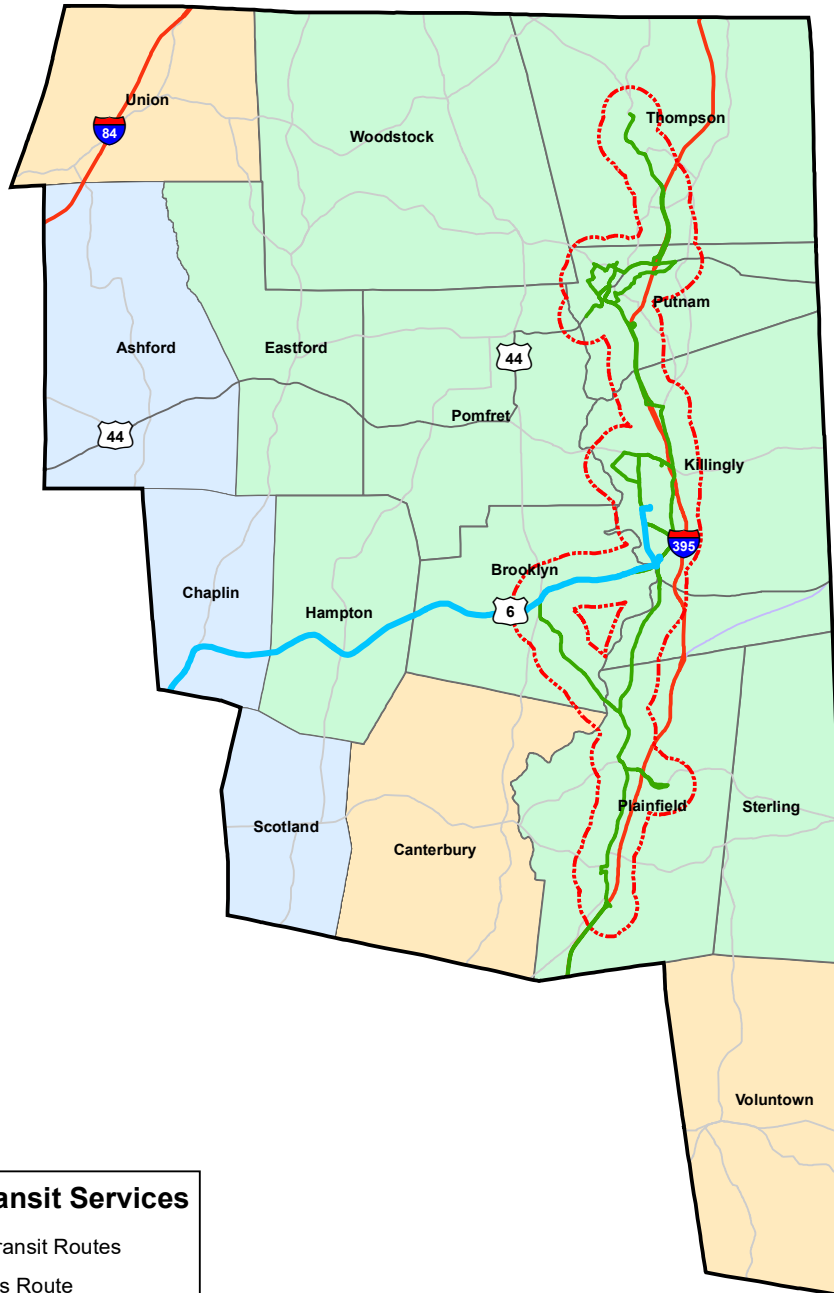
Regional Transit Services

- WRTD Bus Route
- NECTD Transit Routes
- Deviation Area

Percentage of Families Below Poverty Line

	0% - 6%
	7% - 13%
	14% - 20%
	21% - 30%

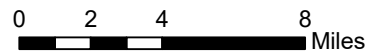


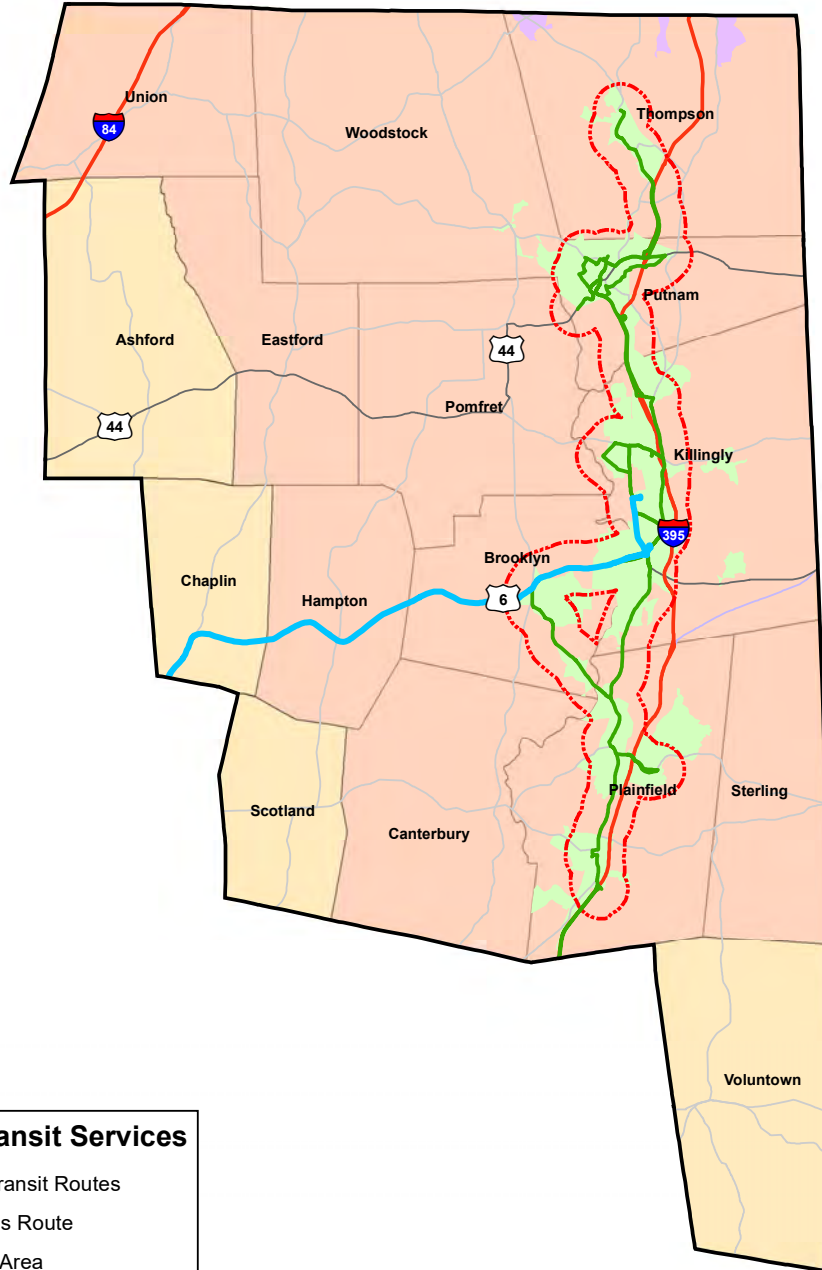


Regional Transit Services







- NECTD Transit Routes
- WRTD Bus Route
- Deviation Area
- Elderly/Disabled Service
- WRTD Dial-a-Ride

This map is for planning purposes only and contains no authoritative data.

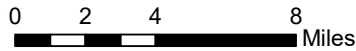




Regional Transit Services

-  NECTD Transit Routes
-  WRTD Bus Route
-  Deviation Area
-  NECTD Service Area
-  2020 Putnam-Killingly Urban Area
-  2020 Worcester Urban Area

This map is for planning purposes only and contains no authoritative data.



2. The frequency with which LEP persons come in contact with NECCOG services.

NECCOG and NECTD has infrequent and unpredictable contact with LEP individuals, largely because of the nature of NECCOG programs and activities. NECCOG and NECTD has had no recorded request for LEP services. The sNECTD website includes direct translation services of AltaVista Babel Fish and telephone interpreter service - Language Line Services at <http://www.language.com>. The translation services for NECTD have not yet been requested or utilized.

NECCOG additionally staffs and hosts the regional Human Services Advisory Council. This council is made up of representatives of most of the social/human service providers in the region and provides us the opportunity to hear directly their concerns as well as potential outreach to LEP populations. Other probable occasions for contact with LEP persons are events such as the NECCOG's public workshops, open houses, and other NECCOG events, many of which are held in concert with developing the NECCOG's planning documents. NECCOG makes an effort to identify and reach out to minority and LEP populations during this development process.

3. The nature and importance of services provided by NECCOG to the LEP population.

Input from all stakeholders is critical to NECCOG's and NECTD's activities and in particular the planning process, so NECCOG invests considerable effort to conduct inclusive public engagement. NECCOG and NECTD encourages and helps the public to understand the planning process and provides many opportunities for the public to participate and comment through a variety of activities, which are described fully in NECCOG's Public Participation Plan.

NECCOG and NECTD engages in and administers a variety of programs, activities, and services of importance to LEP persons in general that are long-term in nature. These include the Long-Range Transportation Plan, Regional Plan of Conservation and Development, Regional Housing Plan and Comprehensive Economic Development Strategy.

NECCOG staffs and hosts the regional Human Services Advisory Council. This council is made up of representatives of most of the social/human service providers in the region and provides us the opportunity to hear directly their concerns as well as potential outreach to LEP populations.

4. The resources available to the NECCOG, and overall costs to provide LEP assistance.

NECCOG and NECTD has implemented the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "Less than very well," and the lack of resources available in NECCOG and NECTD service area:

- a. Census Bureau's "I Speak Cards" are to be located at NECCOG and NECTD Office - personnel will receive training in their proper use.
- b. NECCOG and NECTD receptionist has AltaVista Babel Fish added to the favorites listing for easy access for the translations of blocks of texts. This will aid the staff in the interpretation of services on a one on one basis for LEP individuals visiting NECCOG and NECTD Office.
- c. When an interpreter is needed, in person or on the telephone, and staff has exhausted the above options, staff will first attempt to determine what language is required. Staff shall use the telephone interpreter service - Language Line Services at <http://www.language.com>. On the Language Line

home page the staff will select the “Need an Interpreter Now” link and follow the directions to receive and access code.

- d. All NECCOG and NECTD staff are provided with the LEP Plan and will be educated on procedures to follow. This information will also be part of NECCOG and NECTD staff orientation process for new hires and will be part of annual staff training updates. Training topics are listed below:
 - I. Understanding the Title VI policy and LEP responsibilities;
 - II. What language assistance services NECCOG and NECTD offers;
 - III. Use of LEP “I Speak Cards”;
 - IV. How to access Alta Vista Babel Fish via NECCOG and NECTD computers in NECCOG and NECTD Offices;
 - V. How to use the Language Line interpretation and translation services;
 - VI. Documentation of language assistance requests;
 - VII. How to handle a Title VI and/or LEP complaint

- f. As previously noted, NECCOG staffs and hosts the regional Human Services Advisory Council. This council is made up of representatives of most of the social/human service providers in the region and provides us the opportunity to hear directly their concerns as well as potential outreach to LEP populations. Additionally:
 - I. If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or 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.
 - II. When running a general public meeting notice, staff will insert the clause, based on the LEP population and when relevant, 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.”
 - III. Key print materials will be translated and made available at NECCOG Office and in communities when a specific and concentrated LEP population is identified.

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Public Participation

This is a summary of the plan

NECCOG and NECTD is committed to transparency and access to services, information and the decision-making process for people throughout the region. Because planning is about people and the communities they call home, it is about where and how the region's residents live, work and play, making life better for people of all ages, incomes and abilities. Community participation improves the relevance of plans, policies, services and projects, and helps NECCOG and NECTD meet people's needs today and into the future.

NECCOG and NECTD Public Involvement Plans and Limited English Proficiency Plans has an emphasis on engaging individuals and segments of the public who are directly affected by a project. NECCOG and NECTD staff is encouraged to both reach out to groups of people traditionally underrepresented and significantly affected by the decisions a project entails. However, leveraging NECCOG and NECTD existing, robust relationships with the jurisdictions where the members of the public reside will also be useful.

NECCOG and NECTD is committed to an engagement model that fosters shared problem-solving, supportive partnerships and reciprocal relationships. NECCOG and NECTD believes that the region's decision-makers need to hear its residents' full range of perspectives to better understand issues, explore alternatives and create a shared action plan. Through the principles, NECCOG and NECTD intends to demonstrate that it provides clear and concise information, is responsive to the people of the region and addresses ideas and concerns raised.

Principles To support the commitment described above, NECCOG and NECTD uses the following principles to guide engagement:

- **EARLY ENGAGEMENT** - NECCOG and NECTD engages the public toward the beginning of each project, or when members of the public can have the greatest effect on shaping the direction of NECCOG and NECTD efforts.
- **ONGOING ENGAGEMENT** - NECCOG and NECTD engages the public throughout development of a project, or at specific phases identified early in the process. NECCOG and NECTD provides members of the public with clear and specific timelines and methods for providing their perspectives.
- **TIMELY AND ADEQUATE NOTICE** - NECCOG and NECTD ensures that the public receives timely and adequate notice of opportunities for public engagement.
- **CONSISTENT ACCESS TO INFORMATION** - NECCOG and NECTD follows state, federal and funding partner requirements, as well as organization policies, regarding making supporting material available for topics on which it has invited members of the public to provide their perspectives.
- **INVITATION FOR PUBLIC REVIEW AND COMMENT** - NECCOG and NECTD invites public review of, and comment on, essential plans and programs. Invitations will be made no later than is required by federal and state requirements or funding partners (typically 30 to 45 days). For projects lacking specific partner requirements for public engagement, NECCOG and NECTD will determine the appropriate length of the review period. Copies of public review drafts are made available at NECCOG and NECTD office and website. Comments are accepted by mail, email and via neccog.org and nectd.org.

The following is a list of current plans and programs with established public engagement processes:

- When NECCOG and NECTD conducts a formal public hearing, members of the public are provided the opportunity to testify. Some plans and projects are also discussed in committee meetings prior to the formal public hearing.
- Comments collected during formal public comment periods and hearings are provided in their entirety and with staff responses to the Board of Directors when it is slated to take action. The format of these responses may vary based on the project, but will typically be incorporated into a matrix. In other instances, NECCOG and NECTD balances its employees' professional expertise and technical analysis with perspectives gathered from the public during project development.
- For formal comment periods and hearings, all comments are provided to the Board of Directors for consideration. During other opportunities for the public to provide their perspectives, NECCOG and NECTD responds as is appropriate to the situation.

Invitation And Consideration Of Perspectives From Those Traditionally Under Represented

NECCOG and NECTD invites participation by members of populations traditionally under-represented in regional decision making processes due to demographic, geographic or economic circumstances, to allow NECCOG and NECTD to appropriately consider their needs. Such populations include, but are not limited to, individuals who speak languages other than English, individuals representing diverse cultural backgrounds, low-income individuals, people with disabilities, older adults and young adults. NECCOG and NECTD uses demographic and stakeholder analysis to identify communities for projects for which it seeks public engagement. NECCOG and NECTD Limited English Proficiency plans guides staff in providing customer service to, and facilitating participation by, members of the public whose proficiency in English is limited .

Regular Review Of Public Engagement Processes

NECCOG and NECTD regularly reviews the implementation of this plan and the ability of the principles, steps, techniques and tools in this document to advance meaningful public engagement. NECCOG and NECTD will use a variety of means to determine the effectiveness of engagement strategies including data collection, feedback from participants of public events, review of attendance at public events and evaluation of the implementation of a variety of techniques and tools. The outcomes of these evaluations will inform future engagement, and successful activities will be continued while those that underperform will be eliminated. A routine evaluation summary of engagement activities will also be compiled to share results of the organization's recent engagement efforts and review areas of success and potential improvement. In addition to NECCOG and NECTD commitment to continuous improvement and evaluation of its public engagement activities, the organization's efforts are periodically reviewed by funding partners and agencies such as the Connecticut Department of Transportation.

The Public Participation Plan is reviewed every three years (from date of most recent adoption) by the staff of NECCOG and NECTD to assess the effectiveness of its procedures. Staff shall submit recommended revisions or amendments to the Transportation Technical and Policy Committees. Pursuant to 23 CFR 450.316(a) (3), action by the Technical and Policy Committees to adopt revisions to or amendment of the Public Participation Plan shall be preceded by a period of public review and comment of not less than 45 days.

Language Assistance Plan

NECCOG and NECTD, as a recipient of federal funds, is responsible for determining the right mix of language assistance services based upon what is reasonable and necessary for the recipient after consideration of the results from the Four Factor Analysis. NECCOG and NECTD Four Factor analysis shows that the Region has a low, overall LEP population and that NECCOG has infrequent contact with LEP persons; therefore, NECCOG and NECTD has determined that it will provide language assistance services on a case-by-case or as-needed basis. NECCOG and NECTD is prepared at all times to respond to each request for language assistance and to provide reasonable access to NECCOG and NECTD programs and activities. Language assistance may include oral interpretation services of agency documents or at public events, written or electronic translation of summaries of agency documents or the full text of agency documents.

NECCOG and NECTD will also place a statement on its website that informs visitors that NECCOG will provide language assistance services free of charge and upon request. **This statement will be placed on NECCOG's website in Spanish; however, additional languages will be added if, after an examination of the data, the proportion of other languages spoken by LEP persons in the Region changes to a level that indicates that translation into other languages is needed.**

Specific Assistance Strategies:

Oral Language Services (Interpretation)

Interpretation is the act of listening to something in one language (source language) and orally translating it into another language (target language). As a recipient of federal funds, the NECCOG and NECTD must make reasonable efforts to provide interpretation services for LEP individuals. When providing interpretation services, recipients shall ensure competency of the language service provider to maintain the quality and accuracy of the services provided. The U.S. DOT Policy Guidance on LEP persons outlines a series of acceptable oral language assistance services that recipients can employ to serve LEP individuals.

Given the infrequency of contact with LEP individuals and the low concentration of LEP populations in the NECCOG and NECTD region, providing robust interpretation services is not deemed necessary at this time. When interpretation services are requested, the NECCOG will use the telephonic interpretation services that it has in place. The telephonic interpretation service offers prompt assistance in many different languages and can be used in a variety of situations.

Written Language Services

The U.S. DOT Policy Guidance on responsibilities to LEP individuals includes "safe harbor" provisions for organizations. A "safe harbor" means that if a recipient has identified a plan to provide written translations under a set of circumstances, such action will be considered strong evidence of compliance with the written translation obligations under Title VI.

Under safe harbor, the following activities will be considered strong evidence of compliance with the NECCOG's written translation obligations.

- NECCOG and NECTD will provide written translations of vital documents for each eligible LEP language group that constitutes 5% of the population served or 1,000 individuals, whichever is less. Translation of other documents, if needed, can be provided orally through a competent interpreter.

- NECCOG and NECTD may not translate vital written materials for language groups consisting of fewer than 50 individuals but will provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials free of cost.

These safe harbor provisions apply to translation services for written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through oral interpreters where oral language services are needed and are reasonable.

NECCOG and NECTD has identified the following documents as vital written materials:

- Title VI Notice
- Title VI Complaint Form
- Title VI Complaint Procedures
- Title VI Plan

NECCOG and NECTD will adhere to the “safe harbor” provisions with regard to these vital written materials. Based on the Four-Factor analysis no such populations are in place.

The NECCOG and NECTD will regularly monitor the concentration of LEP individuals, and when the population of any LEP language group exceeds the identified safe harbor provisions, the NECCOG and NECTD will outline a plan to provide written translation of its vital documents. The translation of other planning documents will be provided upon request.

Website: NECCOG and NECTD websites are equipped with a translation option covering multiple languages.

Providing Notice to LEP Persons: NECCOG and NECTD shall provide notice to LEP persons that language services are available at no cost to the individual using the following methods:

- A notice regarding language assistance for LEP individuals will be posted on the NECCOG and NECTD websites (www.neccog.org and nectd.org), along with related documents and a copy of this plan.
- Signage will be posted at NECCOG and NECTD indicating that free language assistance is available.
- A notice regarding the availability of language assistance for LEP individuals will be published in local newspapers on an annual basis.
- All NECCOG and NECTD-related meeting announcements will mention that special assistance is available if requested at least seven days prior to the meeting date.
- NECCOG and NECTD staff will work with community-based organizations and other stakeholders during development of the LRTP and other activities to inform LEP individuals of NECCOG programs and the availability of language assistance.
- COG staff will attempt to identify concentrations of LEP populations using ACS data and implement targeted outreach for specific projects.

Training: NECCOG and NECTD will make every reasonable effort to ensure that staff is adequately trained to assist LEP individuals in person or by telephone. All staff and all NECCOG and NECTD committee mem-

bers will be provided a copy of the LEP Plan and will be informed of the interpretation and translation services offered to LEP individuals.

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, NECCOG and NECTD will follow the Title VI Program update schedule for the LEP Plan. However, major updates most likely will not occur until the next Census in 2020 unless NECCOG finds it necessary for an update before such time. 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 NECCOG and NECTD service area?
4. Has there been a change in the types of languages where translation services are needed?
5. Is there still a need for continued language assistance for previously identified NECCOG and NECTD programs?
6. Are there other programs that should be included?
7. Have the NECCOG's and NECTD 's available resources, such as technology, staff, and financial costs changed?
8. Has NECCOG and NECTD fulfilled the goals of the LEP Plan?
9. Were any complaints received?

Appendix A - Title VI Contract Assurances

The text below is the contract language to be used when engaging consultants or other entities in connection with any NECCOG and NECTD project. During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor will comply with the Regulations relative to nondiscrimination in federally assisted programs of the United States Department of Transportation Federal Highway Administration, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Nondiscrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, national origin, sex, age, disability, income or Limited English Proficiency in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Federal Highway Administration to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information, the contractor will so certify to the Recipient or the Federal Highway Administration, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Non-compliance:** In the event of the contractor's non-compliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:
 - a. withholding contract payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with, litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

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Appendix B

The following is made part of all meeting notices by NECCOG and NECTD:

NECCOG and NECTD meetings are conducted in accessible locations and materials can be provided in accessible formats. If you would like special accommodations, such as an interpreter, please contact the NECCOG and NECTD at: (860)774-1253, or necogoffices@nec-cog.org at least 3 days prior to the meeting. The NECCOG and NECTD fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The NECCOG and NECTD does not discriminate on the basis of race, color, national origin, English proficiency, income, religious creed, ancestry, disability, age, gender, sexual orientation, military service, or gender identity or expression.

Any person who believes himself/herself or any specific class of persons have been subjected to discrimination prohibited by Title VI or related statutes or regulations may, himself/herself or via a representative, file a complaint with the NECCOG and NECTD.

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Appendix C - Non-Discrimination Statutes and Authorities

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non discrimination statutes and authorities; including but not limited to:

- Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. § 2000d et seq.), (prohibits discrimination on the basis of race, color, national origin), as implemented by 49 C.P.R. § 21.1 et seq. and 49 C.P.R. pmt 303;
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S .C. § 4601) (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal aid programs and projects);
- Federal Aid Highway Act of 1973 (23 U.S.C. § 324 et seq,) (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794 et seq.) (prohibits discrimination on the basis of disability); and 49 C.F.R. part 27;
- The Age Discrimination Act of 1975, as amended (42 U.S.C. § 6101 et seq.) (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982 (Pub. L. 97"248 (1982)), as amended (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987 (102 Stat. 28) (" which restore[d] the broad scope of coverage and to clarify the application of title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and title VJ of the Civil Rights Act of 1964.");
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131 "" 12189), as implemented by Department of Justice regulations at 28 C.F.R. parts 35 and 36, and Department of Transportation regulations at 49 C.F.R. parts 37 and 3 8;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations, which ensures non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. § 1681 et seq).

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Appendix D - Governing Laws and Regulations

Federal Statutes

Moving Ahead for Progress in the 21st Century Act (MAP-21) (07/06/2012) The Age Discrimination in Employment Act of 1967, as amended (02/20/2009) The Equal Pay Act of 1963 (02/20/2009)

Title VI of the Civil Rights Act of 1964, Pub. L. No. 88-352, 78 Stat. 252 (1964) (42 U.S.C. §§ 2000d-2000d-7) – provides that 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.

The Age Discrimination Act of 1975 (42 U.S.C §§ 6101-6107) – prohibits age discrimination in Federally Assisted Programs.

The Federal-aid Highway Act, (49 U.S.C. § 306) – Outlines responsibilities of the U.S. DOT and the Secretary's authority to determine compliance with applicable Civil Rights statutes.

The Federal-aid Highway Act, Pub. L. No. 97-449, 96 Stat. 2421 (1983) (codified as amended at 49 U.S.C. § 306) – added the requirement that there be no discrimination on the grounds of sex in DOT financial assistance programs.

The 1973 Federal-Aid Highway Act, Pub. L. No. 93–87, 87 Stat. 250 (1973) (23 U.S.C. § 324) – added the requirement that there be no discrimination on the grounds of sex in Title 23 programs.

The Civil Rights Restoration Act of 1987, Pub L. No 100-259, 102 Stat. 28 (1988) - restored the broad, institution-wide scope and coverage of the nondiscrimination statutes to include all programs and activities of Federal-aid recipients, sub-recipients and contractors, whether such programs and activities are federally assisted or not.

The Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970, Pub. L. No. 91-646, 84 Stat. 1894 (1971) (codified as amended at 42 U.S.C. §§ 4601-4638) – provides for fair treatment of persons displaced by Federal and Federal-aid programs and projects.

The Uniform Relocation Act Amendments of 1987, Pub. L. No. 101- 246 – Updated the 1970 Act and clarified the intent of Congress in programs and projects which cause displacement.

Rehabilitation Act Amendments of 1986, Pub L. No. 99–506, 100 Stat. 1807 (1986) (42 U.S.C. § 2000d-7) – abrogated recipient state sovereign immunity from suit under Title VI.

The American with Disabilities Act, Pub. L. 101-336 – provides enforceable standards to address discrimination against individuals with disabilities.

The American with Disabilities Act, Pub. L. No. 101-336, 104 Stat. 327 (1990) (codified as amended at 42 U.S.C. § 12101 et seq.) – added the requirement that there be no discrimination on the grounds of disability, abrogated sovereign immunity, and provided enforceable standards to address discrimination against individuals with disabilities.

The Civil Rights Act of 1991, Pub. L. No. 102–166, 105 Stat. 1071 (1991) (codified in part at 42 U.S.C. § 1981) – in part, amended Section 1981 of 42 U.S.C. to provide a definition for the term “make and enforce contracts”, and to provide protection of the rights protected by this section against impairment by nongovernmental discrimination un-

der color of State law.

Title VIII of the 1968 Civil Rights Act, Pub. L. No. 90-284, 82 Stat. 81 (1968) (codified as amended at 42 U.S.C. § 3601 et seq) – Requires fair housing practices in the sale or rental of housing, and zoning and planning by localities.

The National Environmental Policy Act of 1969, Pub. L. No. 91-190, 83 Stat. 852 (1969) (42 U.S.C. § 4321) – Requires the preparation of environmental impact statements for major federal agency actions affecting the human environment. Under NEPA, federal agencies and federal aid recipients are required to consider several alternative actions, including the “no- action” alternative, and to consider social, environmental and economic impacts, public involvement.

Title IX of the Education Amendments of 1972, Pub. L. No. 92-318, 86 Stat. 374 (1972) (20 U.S.C.A. § 1682) – makes financial assistance available to institutions of higher education.

Transportation Equity Act for the 21st Century, Pub. L. No. 105–178, 112 Stat. 107 (1999) (codified in part at 23 U.S.C. § 101) – in part, mandates expenditures in federally assisted transportation programs through Disadvantaged Business Enterprises.

Executive Orders

E.O. 12250, 28 C.F.R. Pt. 41, App. A (1980) – Orders DOJ Leadership and Coordination of Nondiscrimination Laws.

E.O. 12259, 46 Fed. Reg. 1253 (1980) – Orders HUD Leadership and Coordination of Federal Fair Housing Programs.

E.O. 12898, 59 Fed. Reg. 7629 (1994) – Orders Federal actions to address Environmental Justice in minority populations and low-income populations.

E.O. 13160, 65 Fed. Reg. 39775 (2000) – Orders nondiscrimination on the basis of race, sex, color, national origin, disability, religion, age, sexual orientation, and status as a parent in federally conducted education and training programs.

E.O. 13166, 65 Fed. Reg. 50121 (2000) – Orders Federal agencies and their recipients to improve access to federally sponsored programs for persons with Limited English Proficiency (LEP).

E.O. 13175, 65 Fed. Reg. 218 (2000) – Orders Consultation and Coordination with Indian Tribal Governments. Regulations

23 C.F.R. §200 – FHWA’s Title VI Program Implementation and Review Procedures.

23 C.F.R. Part 420.121(h) – part of FHWA’s planning regulations that specify the applicability of Title VI of the 1964 Civil Rights Act and Restoration Act of 1987 to FHWA funded planning and research activities.

23 C.F.R. Part 450 –Federal Highway Administration’s Statewide and Metropolitan Planning Regulations.

23 C.F.R. Part 450.316(b) (2) & (3) – requires that the metropolitan planning process be consistent with Title VI of the 1964 Civil Rights Act and the recipient’s Title VI Assurances.

23 C.F.R. Part 633, Subpart A – specifies required contract provisions to be included in all Federal-aid construction contracts under Title VI and other federal provisions.

23 C.F.R. Part 633, Subpart B, Appendix A – specifies the types of contracts to which Title VI of the 1964 Civil Rights Act applies.

23 C.F.R. Part 771.105(f)—FHWA’s Policy on Title VI – expands on 23 C.F.R. 200.7 and names categories covered with wording similar to Title VI of the Civil Rights Act of 1964 – race, color, national origin, age, sex, handicap.

28 C.F.R. Part 35 – DOJ regulations governing nondiscrimination on the basis of disability in State and local government services.

28 C.F.R. Part 41 – Requires DOJ to coordinate the implementation of Section 504 of the Rehabilitation Act, and provides guidelines for determining discretionary practices.

28 C.F.R. Part 42, Subpart C – DOJ’s implementation of Title VI of the Civil Rights Act of 1964.

28 C.F.R. Part 42.200, Subpart D – “Nondiscrimination in Federally assisted Programs – Implementation of Section 815 (c) (1) of the Justice System Improvement Act of 1979” – implements E.O. 12138.

28 C.F.R. Part 50.3 – DOJ’s guidelines for the enforcement of Title VI, Civil Rights Act of 1964. 49 C.F.R. Part 21 – DOT’s implementation of Title VI of the Civil Rights Act of 1964.

49 C.F.R. Part 24 – DOT’s implementation of the Uniform Relocation and Real Property Acquisition Act for Federal and federally assisted programs requiring compliance with Nondiscrimination Statutes and Executive Orders.

49 C.F.R. Part 25 – DOT’s implementation of Title IX of the Education Amendments Act of 1972. 49 C.F.R. Part 26 – DOT’s implementation of Participation by Disadvantaged Business Enterprises in DOT Financial Assistance Programs.

49 C.F.R. Part 27 – DOT’s implementation of Section 504 of the Rehabilitation Act of 1973 as amended.

49 C.F.R. Part 28 – Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities Conducted by the Department of Transportation.

49 C.F.R. Part 37 – Transportation Services for Individuals with Disabilities, implementing the transportation and related provisions of Title II and III of the ADA proscriptions included in Form FHWA 1273.

Administrative Guidance

FHWA Order 4710.1 – Right-of-Way Title VI Review Program.

FHWA Order 4710.2 – Civil Rights Compliance Reviews of Location Procedures.

FHWA Order 4720.6 – Civil Rights Restoration Act of 1987 in FHWA Programs.

FHWA Order 6640.23 – Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.

Joint FHWA/FTA Memorandum dated October 7, 1999: Guidance on Implementing Title VI in Metropolitan and Statewide Planning.

DOJ Title VI Legal Manual (September, 1998) Processing Complaints Filed Under Title VI of the Civil Rights Act of 1964 (Title VI) and the Americans with Disabilities Act of 1990 (ADA)

DOJ Policy Guidance Document dated January 11, 2002 – Memo re: E.O. 13166, Improving Access to Services for persons with Limited English Proficiency.

DOJ Policy Guidance Document dated January 18, 2002 – Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons.

FTA C 4702.1B (October 1, 2012) –“Title VI Requirements and Guidelines for Federal Transit Administration Recipients.” Provides FTA financial assistance recipients with guidance on implementing Title VI regulations.

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Appendix E - Data Haven - Northeastern Connecticut COG
2023 Equity Profile¹

¹ Seaberry, C., Davila, K., Abraham, M. (2023). Northeastern Connecticut COG Equity Profile. New Haven, CT: DataHaven. Published August 2023. More information at ctdatahaven.org



NORTHEASTERN CONNECTICUT COG 2023 EQUITY PROFILE

DataHaven

NORTHEASTERN CONNECTICUT COG 2023 EQUITY PROFILE

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Compiled by DataHaven in August 2023.

This report is designed to inform local-level efforts to improve community well-being and racial equity. This is version 2.0 of the DataHaven region equity profile, which DataHaven has published for all 169 towns and several regions of Connecticut. Please contact DataHaven with suggestions for version 3.0 of this report.

ctdatahaven.org

EXECUTIVE SUMMARY

Throughout most of the measures in this report, there are important differences by race/ethnicity and neighborhood that reflect differences in access to resources and other social needs. Wherever possible, data are presented with racial/ethnic breakdowns, as defined by existing federal data collection standards. However, for smaller groups or more detailed breakdowns, some values may not be available or have less reliable data. In these cases, values are marked as “N/A,” not available.

Federal and statewide approaches to data collection, including small sample sizes, tend to hide disparities within certain population groups. This does not mean that a given population is not impacted by inequitable social conditions. DataHaven and other organizations often collect information on demographic characteristics besides race/ethnicity, and encourage further analysis and advocacy that can lead to more inclusive data reporting. Please contact DataHaven at info@ctdatahaven.org with questions about additional reporting that may be possible.

- Northeastern Connecticut COG is a region of **95,348 residents**, **13 percent** of whom are people of color. The region’s population has decreased by **1 percent** since 2010.
- Of the region’s **38,029 households**, **75 percent** are homeowner households.
- **Twenty-nine percent** of Northeastern Connecticut COG’s households are cost-burdened, meaning they spend at least 30 percent of their total income on housing costs.
- Among the region’s adults ages 25 and up, **25 percent** have earned a bachelor’s degree or higher.
- Northeastern Connecticut COG is home to **27,726 jobs**, with the largest share in the Manufacturing sector.
- The median household income in Northeastern Connecticut COG is **\$69,919**.
- As of 2015, Northeastern Connecticut COG’s average life expectancy was **79.7 years**.
- **Fifty-six percent** of adults in Northeastern Connecticut COG say they are in excellent or very good health.
- In 2021, **32 people** in Northeastern Connecticut COG died of drug overdoses.
- **Eighty-four percent** of adults in Northeastern Connecticut COG are satisfied with their area, and **52 percent** say their local government is responsive to residents’ needs.
- In the most recent state election, **58 percent** of registered voters in Northeastern Connecticut COG voted.
- **Thirty-three percent** of adults in Northeastern Connecticut COG report having stores, banks, and other locations in walking distance of their home, and **37 percent** say there are safe sidewalks and crosswalks in their neighborhood.

OVERVIEW

For the purposes of this report, Northeastern Connecticut COG will be compared to Connecticut as a whole, as well as to Killingly whenever possible. Some indicators are only reliably available by county; in these cases, values will instead be shown for Windham County. Where necessary, data may be presented for a proxy region made up of public use microdata areas (PUMAs) designated by the US Census Bureau, including all of Windham County. **Charts and tables based on these proxy areas are noted as such in their titles.**

Northeastern Connecticut COG is made up of the following towns (with 2020 populations):

- Ashford (4,191)
- Brooklyn (8,450)
- Canterbury (5,045)
- Chaplin (2,151)
- Eastford (1,649)
- Hampton (1,728)
- Killingly (17,752)
- Plainfield (14,973)
- Pomfret (4,266)
- Putnam (9,224)
- Scotland (1,576)
- Sterling (3,578)
- Thompson (9,189)
- Union (785)
- Voluntown (2,570)
- Woodstock (8,221)

The proxy study area is made up of the following locations (with 2020 populations):

- PUMA 0901500 (Windham County) (116,418)

FIGURE 1: STUDY AREA

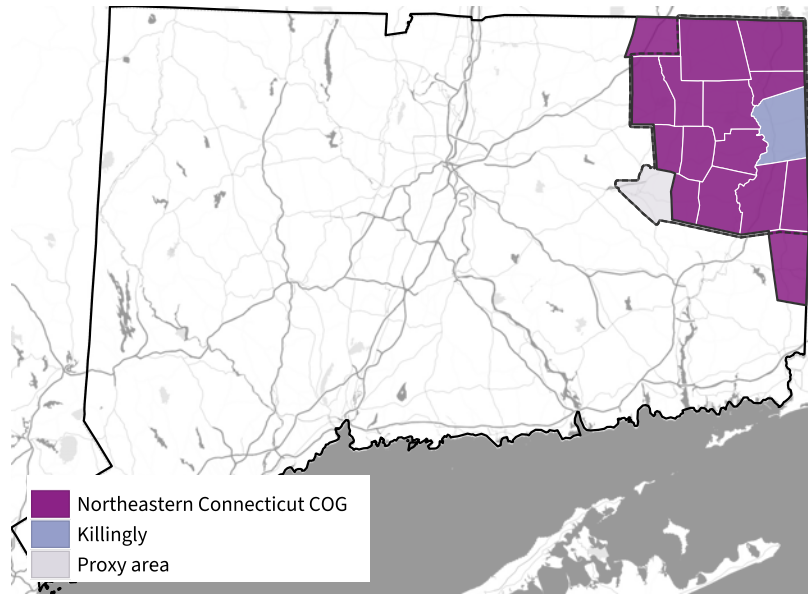


TABLE 1: ABOUT THE AREA

Indicator	Connecticut	Northeastern Connecticut COG	Killingly
Total population	3,605,944	95,348	17,752
Total households	1,397,324	38,029	7,099
Homeownership rate	66%	75%	67%
Housing cost burden rate	35%	29%	36%
Adults with less than a high school diploma	9%	9%	12%
Median household income	\$83,572	\$69,919	\$70,728
Poverty rate	10%	8%	13%
Adults 18–64 w/o health insurance	8%	7%	8%
Life expectancy (years, 2015)	80.3	79.7	78.2

DEMOGRAPHICS

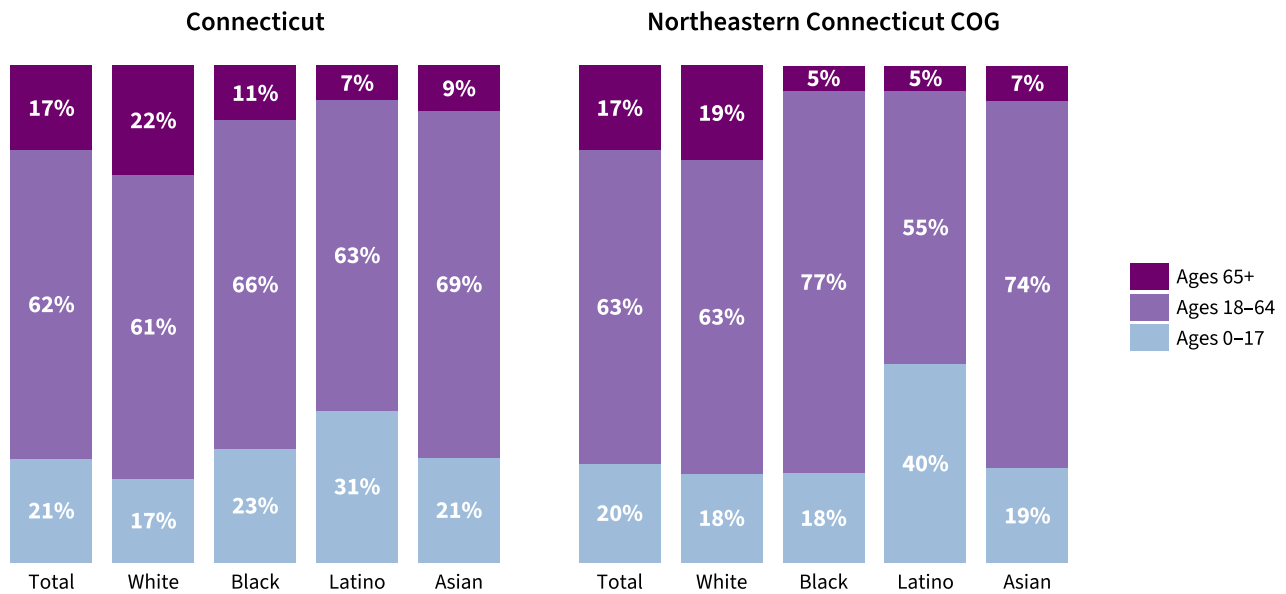
As of 2020, the population of Northeastern Connecticut COG is 95,348, including 18,966 children and 76,382 adults. Thirteen percent of Northeastern Connecticut COG’s residents are people of color, compared to 37 percent of residents statewide.

TABLE 2: POPULATION BY RACE/ETHNICITY, 2020

Area	White		Black		Latino		Asian		Other race/ethnicity	
	Count	Share	Count	Share	Count	Share	Count	Share	Count	Share
Connecticut	2,279,232	63%	360,937	10%	623,293	17%	170,459	5%	172,023	5%
Northeastern Connecticut COG	83,354	87%	1,175	1%	4,356	5%	1,181	1%	5,282	6%
Killingly	15,298	86%	235	1%	837	5%	326	2%	1,056	6%

As Connecticut’s predominantly white Baby Boomers age, younger generations are driving the state’s increased racial and ethnic diversity. Black and Latino populations in particular skew much younger than white populations.

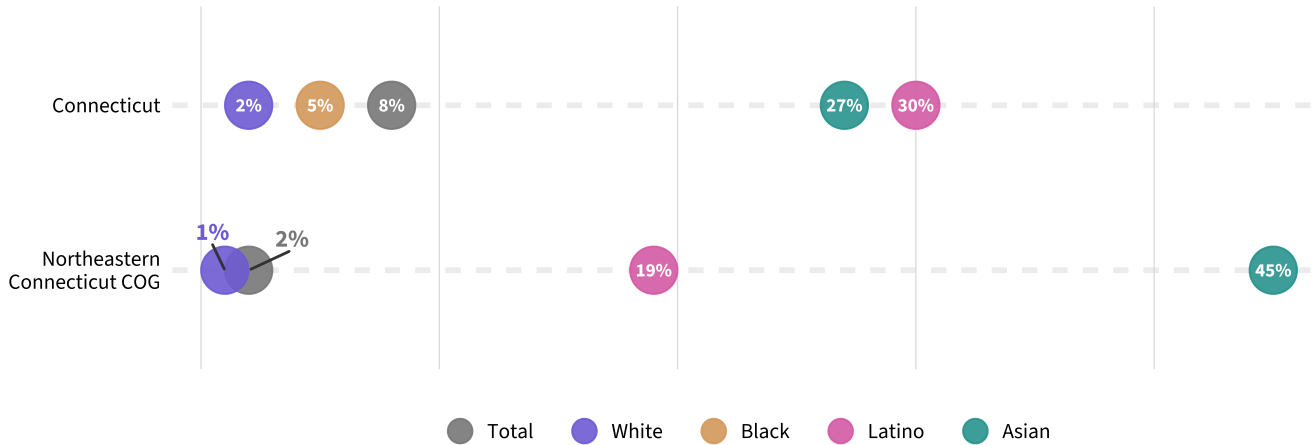
FIGURE 2: POPULATION BY RACE/ETHNICITY AND AGE GROUP, 2021



Note: Only groups with at least 50 residents in each age group shown.

Linguistic isolation is characterized as speaking English less than “very well.” People who struggle with English proficiency may have difficulty in school, seeking health care, accessing social services, or finding work in a largely English-speaking community. As of 2021, 1,936 Northeastern Connecticut COG residents, or 2 percent of the population ages 5 and older, had limited English proficiency. Latinos and Asian Americans are more likely to have limited English proficiency than other racial/ethnic groups.

FIGURE 3: LINGUISTIC ISOLATION BY RACE/ETHNICITY, 2021



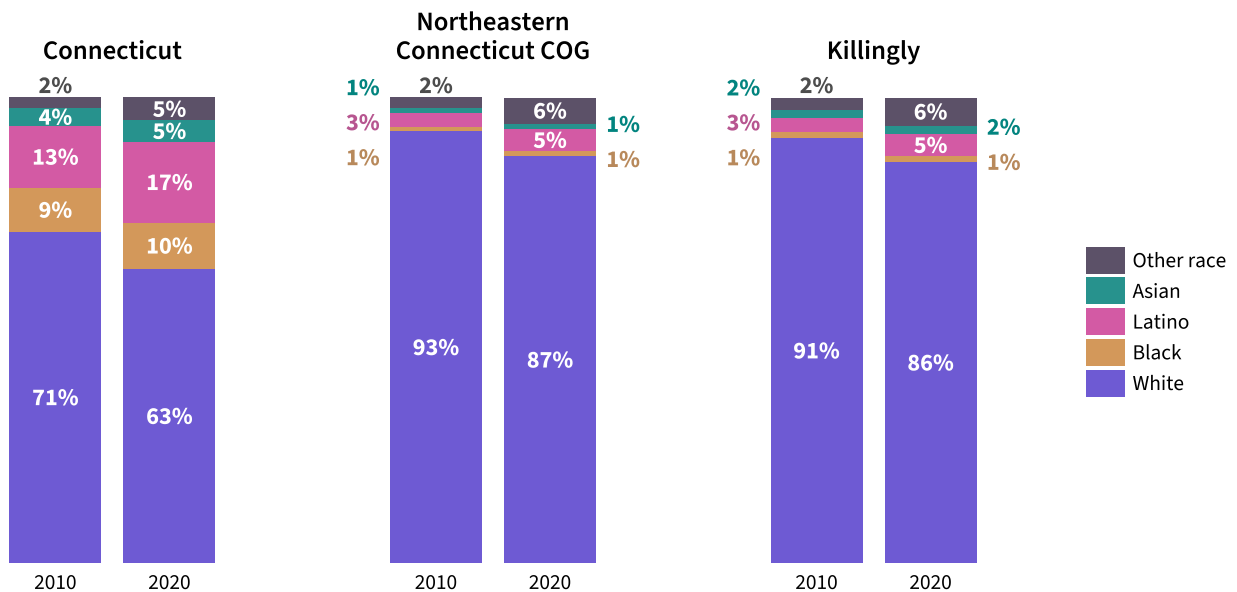
POPULATION CHANGE: 2020 CENSUS

The first set of data from the 2020 Census was released in August 2021, containing basic population counts by age and race/ethnicity. Between 2010 and 2020, Connecticut’s population was nearly stagnant. During the same period, Northeastern Connecticut COG shrank by 1,269 people, a 1.3 percent decrease. The number of white residents in Northeastern Connecticut COG shrank by 7 percent, while the non-white population grew by 73 percent.

TABLE 3: POPULATION AND POPULATION CHANGE BY AGE GROUP, 2010–2020

Area	Age	Population, 2010	Population, 2020	Change	Percent change
Connecticut	All ages	3,574,097	3,605,944	+31,847	+0.9%
	Children (0–17)	817,015	736,717	–80,298	–9.8%
	Adults (18+)	2,757,082	2,869,227	+112,145	+4.1%
Northeastern Connecticut COG	All ages	96,617	95,348	–1,269	–1.3%
	Children (0–17)	21,810	18,966	–2,844	–13.0%
	Adults (18+)	74,807	76,382	+1,575	+2.1%
Killingly	All ages	17,370	17,752	+382	+2.2%
	Children (0–17)	3,888	3,500	–388	–10.0%
	Adults (18+)	13,482	14,252	+770	+5.7%

FIGURE 4: SHARE OF POPULATION BY RACE/ETHNICITY, 2010–2020



HOUSING

Northeastern Connecticut COG has 38,029 households, of which 75 percent are homeowner households. Of the region’s 41,380 housing units, both occupied and vacant, 76 percent are in single-family buildings and 21 percent are in multifamily buildings.

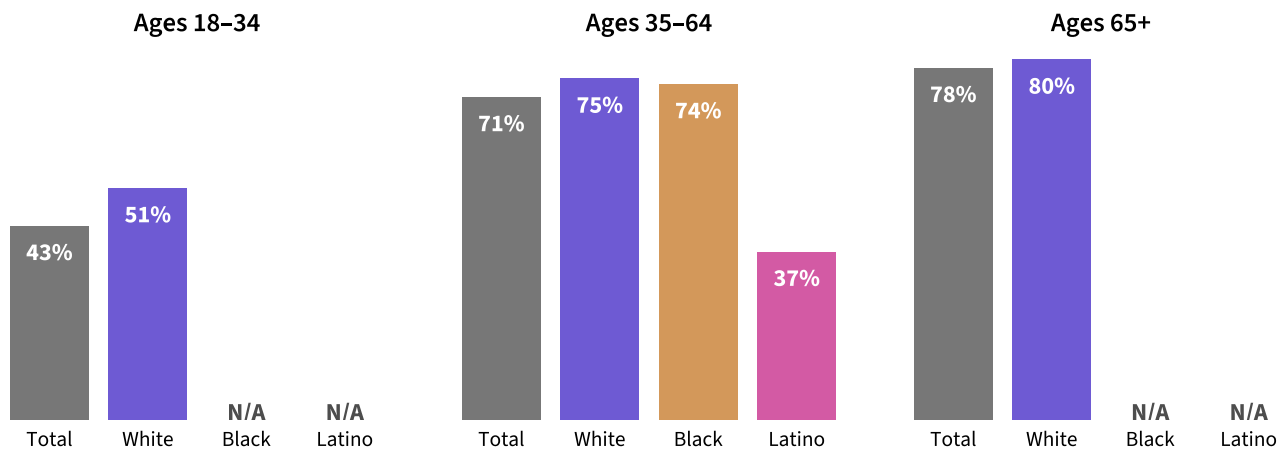
Homeownership rates vary by race/ethnicity. Purchasing a home is more attainable for advantaged groups because the process of purchasing a home has a long history of racially discriminatory practices that continue to restrict access to homeownership today. This challenge, coupled with municipal zoning dominated by single-family housing, results in de facto racial and economic segregation seen throughout Connecticut.

TABLE 4: HOMEOWNERSHIP RATE BY RACE/ETHNICITY OF HEAD OF HOUSEHOLD, 2021

Area	Total	White	Black	Latino	Asian
Connecticut	66%	76%	41%	37%	60%
Northeastern Connecticut COG	75%	77%	N/A	52%	74%
Killingly	67%	71%	N/A	N/A	N/A

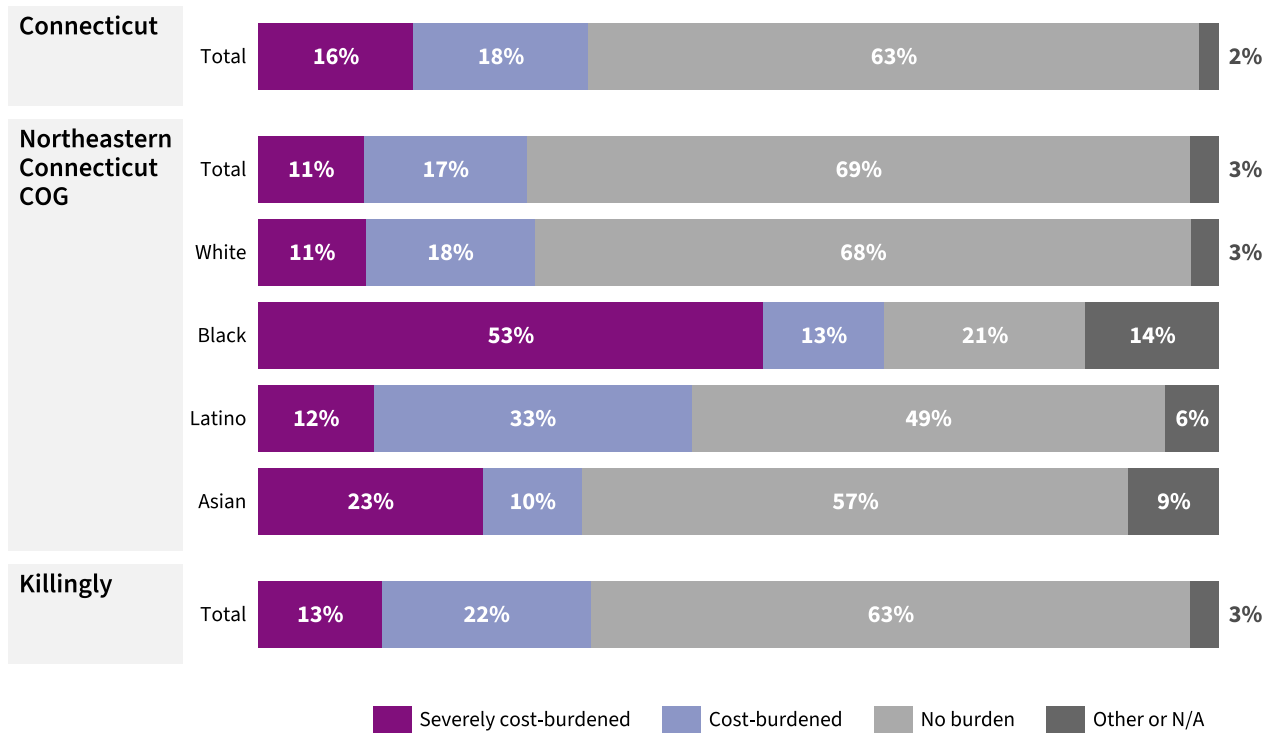
Younger adults are less likely than older adults to own their homes across several race/ethnicity groups. However, in most towns, younger white adults own their homes at rates comparable to or higher than older Black and Latino adults.

FIGURE 5: HOMEOWNERSHIP RATES BY AGE AND RACE/ETHNICITY OF HEAD OF HOUSEHOLD, NORTHEASTERN CONNECTICUT COG, 2021 (WITH PROXY AREA)



A household is cost-burdened when they spend 30 percent or more of their income on housing costs, and severely cost-burdened when they spend half or more of their income on housing costs. Housing costs continue to rise, due in part to municipal zoning measures that limit new construction to very few towns statewide. Cost-burden generally affects renters more than homeowners, and has greater impact on Black and Latino householders. Among renter households in Northeastern Connecticut COG, 43 percent are cost-burdened, compared to 23 percent of owner households.

FIGURE 6: HOUSING COST-BURDEN RATES BY RACE/ETHNICITY, 2021 (WITH PROXY AREA)



Household overcrowding is defined as having more than one occupant per room. Overcrowding may increase the spread of illnesses among the household and can be associated with higher levels of stress. Increasing the availability of appropriately-sized affordable units helps to alleviate overcrowding.

TABLE 5: OVERCROWDED HOUSEHOLDS BY RACE/ETHNICITY OF HEAD OF HOUSEHOLD, 2021

Area	Total		White		Black		Latino		Asian	
	Count	Share	Count	Share	Count	Share	Count	Share	Count	Share
Connecticut	27,078	2%	7,418	1%	4,868	3%	10,971	6%	3,445	6%
Northeastern Connecticut COG	275	1%	258	1%	<50	N/A	<50	N/A	<50	N/A
Killingly	133	2%	133	2%	<50	N/A	<50	N/A	<50	N/A

EDUCATION

Public school students in Northeastern Connecticut COG are served by 18 school districts for pre-kindergarten through grade 12, including 2 regional districts. During the 2022-23 school year, there were a total of 11,784 students enrolled in these districts, with 2,450 enrolled in the Killingly School District. Tracking student success measures is important since disparate academic and disciplinary outcomes are observed as early as preschool and can ultimately affect a person’s long-term educational attainment and economic potential.

FIGURE 7: PUBLIC K-12 STUDENT ENROLLMENT BY RACE/ETHNICITY PER 100 STUDENTS, 2022-23

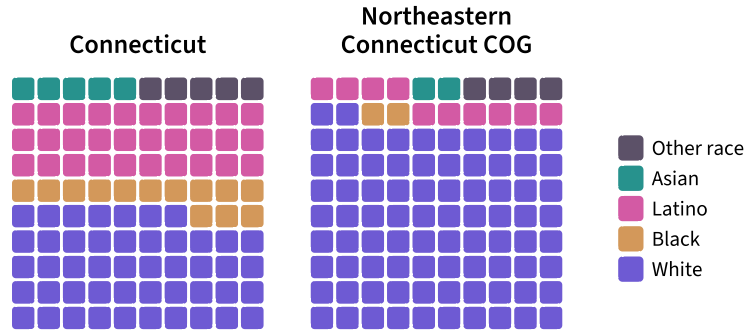
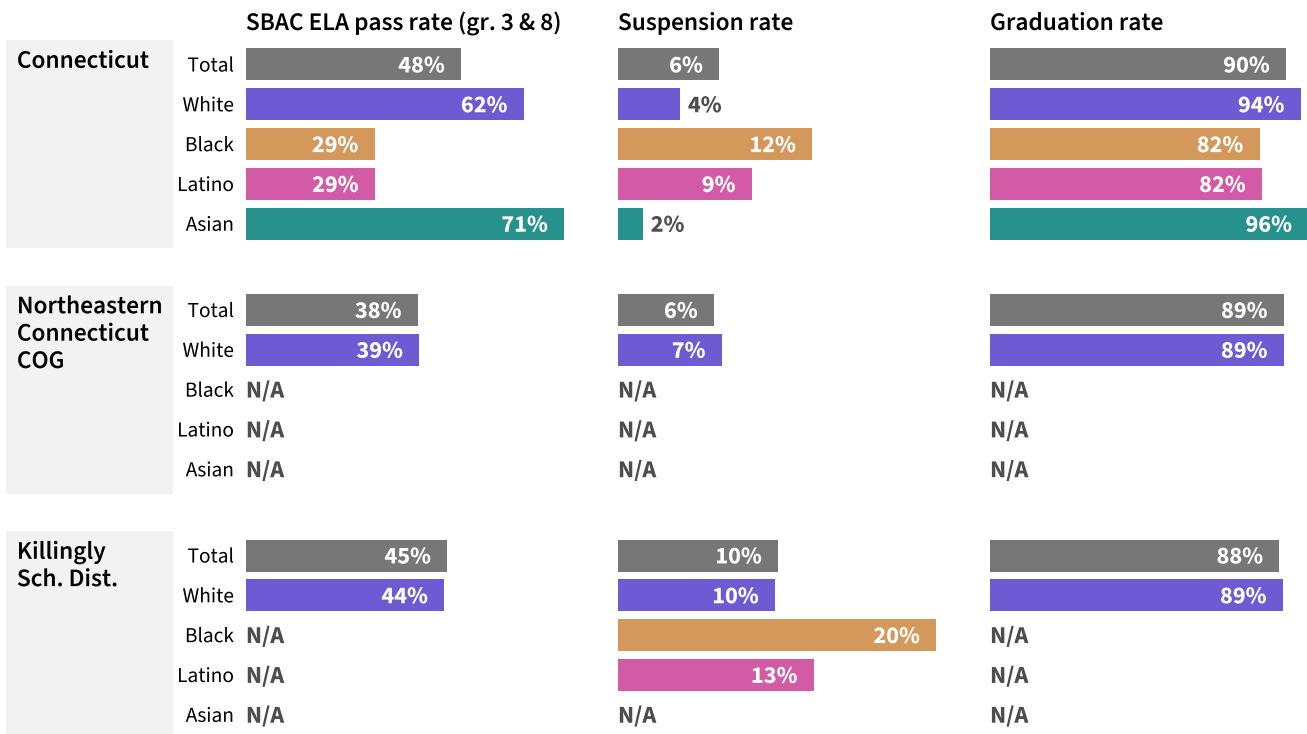
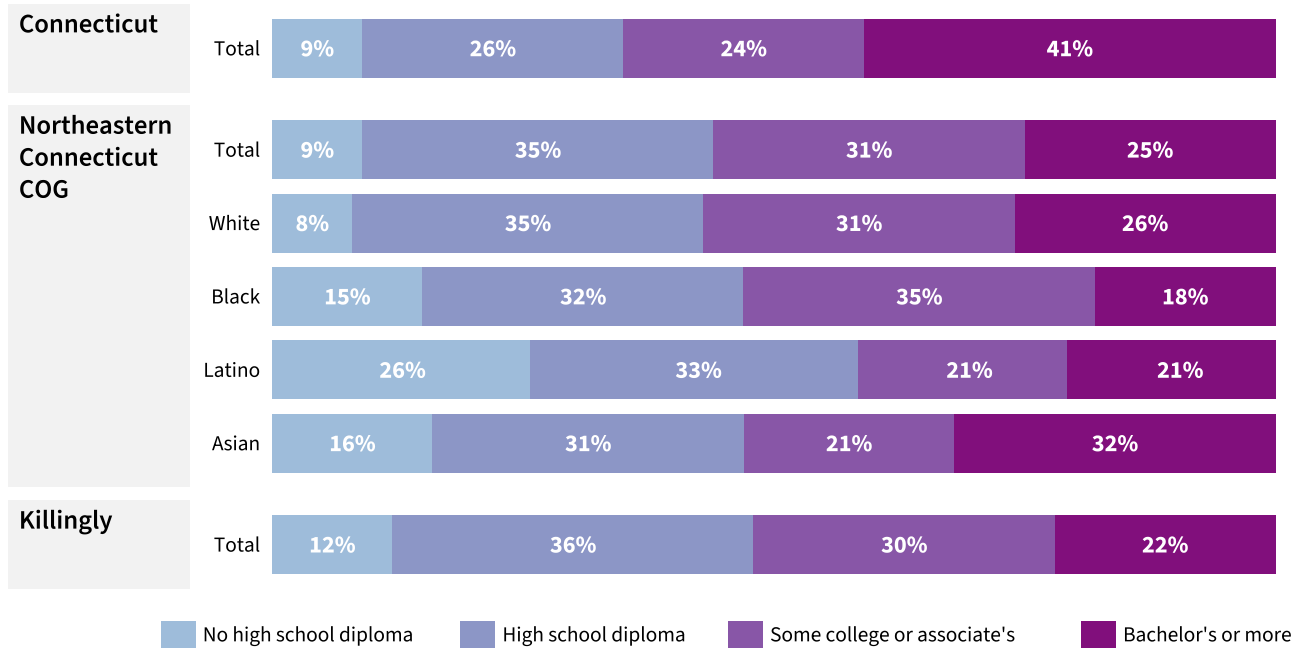


FIGURE 8: SELECTED ACADEMIC AND DISCIPLINARY OUTCOMES BY STUDENT RACE/ETHNICITY, 2020-21 AND 2021-22 SCHOOL YEARS



Adults with high school diplomas or college degrees have more employment options and considerably higher potential earnings, on average, than those who do not finish high school. In Northeastern Connecticut COG, 9 percent of adults ages 25 and over, or 6,339 people, lack a high school diploma; this share is 9 percent statewide and 12 percent in Killingly.

FIGURE 9: EDUCATIONAL ATTAINMENT BY RACE/ETHNICITY, SHARE OF ADULTS AGES 25 AND UP, 2021



ECONOMY

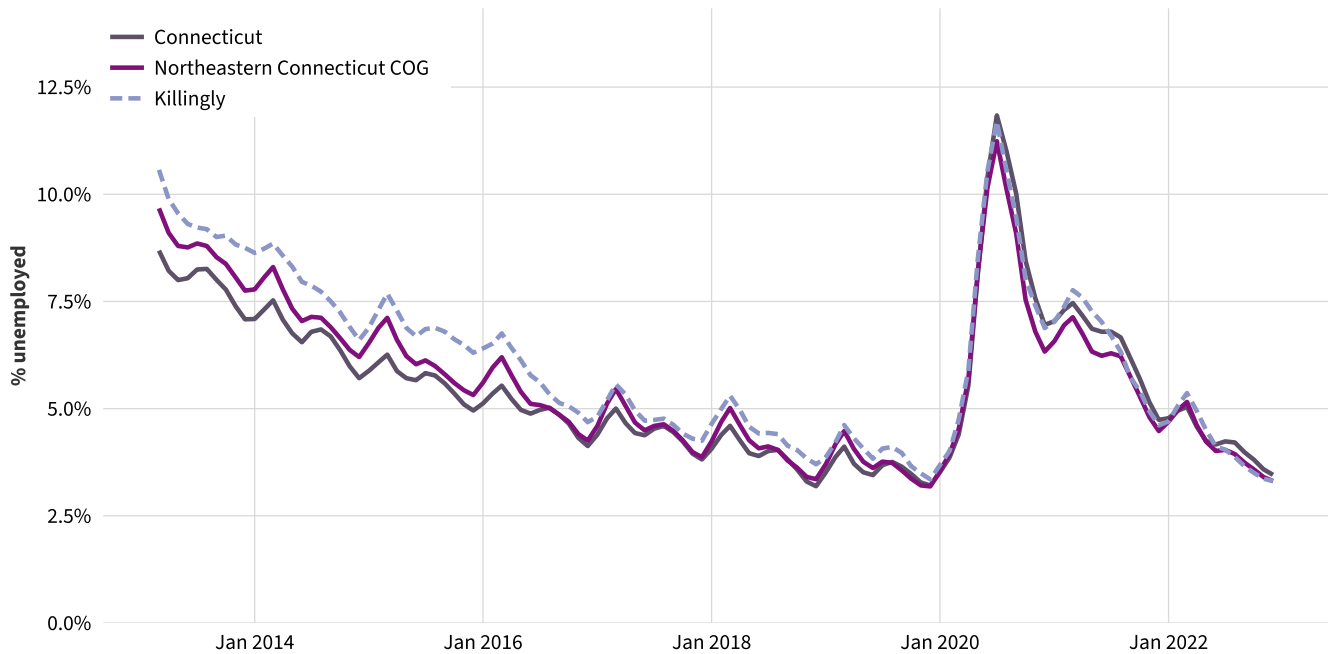
At the end of 2021, there were 27,726 total jobs based in towns in Northeastern Connecticut COG, with 8,376 of these based in Killingly. The Manufacturing sector comprises the largest share of jobs in the region. While many industries saw major job losses early on in the COVID-19 pandemic, by early 2023 the number of jobs statewide had nearly caught back up to pre-pandemic counts.

TABLE 6: JOBS AND WAGES IN NORTHEASTERN CONNECTICUT COG’S 5 LARGEST SECTORS, 2021

Sector	Connecticut		Northeastern Connecticut COG	
	Total jobs	Avg annual pay	Total jobs	Avg annual pay
All Sectors	1,591,760	\$77,816	27,726	\$50,602
Manufacturing	152,860	\$89,604	4,886	\$64,770
Health Care and Social Assistance	267,984	\$60,835	4,226	\$47,318
Retail Trade	167,286	\$41,652	3,388	\$34,724
Accommodation and Food Services	111,160	\$26,767	2,293	\$22,768
Construction	59,323	\$77,099	862	\$62,349

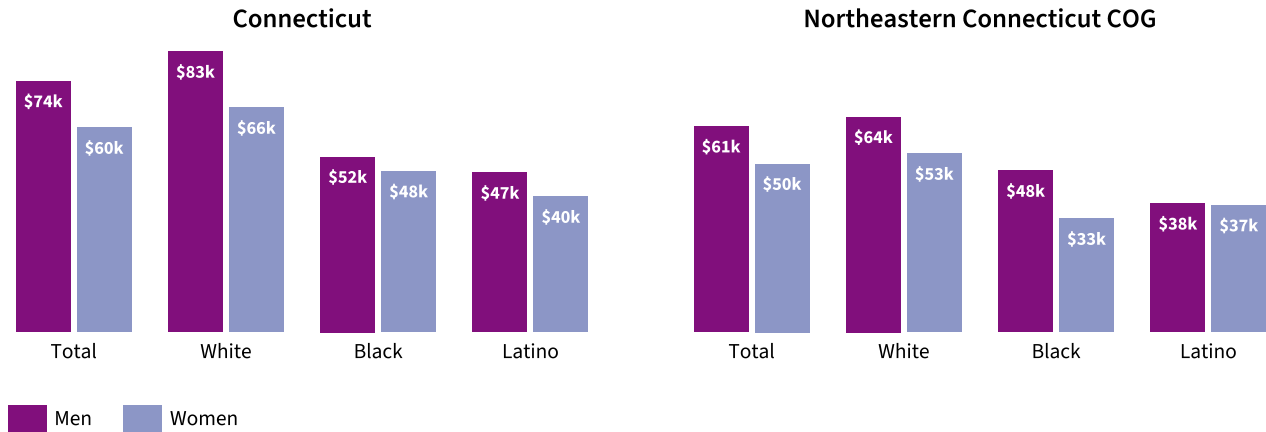
Nationwide, the onset of the pandemic led to a huge spike in unemployment rates, mirrored across Connecticut. At its peak in July 2020, Connecticut’s unemployment rate was 12.0 percent. As of December 2022, unemployment rates statewide and in Northeastern Connecticut COG were 3.2 percent and 3.2 percent, respectively

FIGURE 10: MONTHLY UNEMPLOYMENT RATE, 2013–2022, 3-MONTH ROLLING AVERAGE



Individual earnings vary by race/ethnicity, sex, and other characteristics. These can be measured comparing the differences in average earnings between groups. White workers and men often out-earn workers of color and women. These trends hold even when controlling for educational attainment and within many occupational groups.

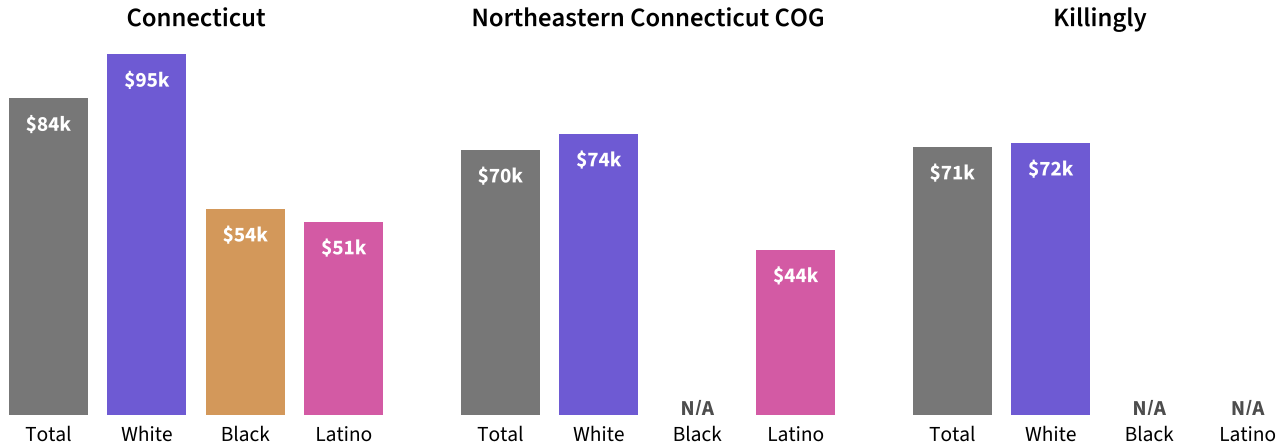
FIGURE 11: MEDIAN INCOME BY RACE/ETHNICITY AND SEX FOR FULL-TIME WORKERS AGES 25 AND OVER WITH POSITIVE INCOME, 2021 (WITH PROXY AREA)



INCOME & WEALTH

The median household income in Northeastern Connecticut COG is \$69,919, compared to \$83,572 statewide. Town-level median household incomes range from \$67,070 in Putnam to \$98,000 in Eastford. Racial disparities in outcomes related to education, housing, employment, and wages result in disparate household-level incomes and overall wealth. Households led by Black or Latino adults generally average lower incomes than white households.

FIGURE 12: MEDIAN HOUSEHOLD INCOME BY RACE/ETHNICITY OF HEAD OF HOUSEHOLD, 2021 (WITH PROXY AREA)



Between the Great Recession and the COVID-19 pandemic, average incomes have not kept pace with inflation over the past two decades. Connecticut’s median household income was \$83,572 in 2021; adjusted for inflation, this was \$1,365 lower than in 2000.

TABLE 7: MEDIAN HOUSEHOLD INCOME IN LARGE TOWNS, 2000–2021, IN 2021 DOLLARS

Area	Income, 2000	Income, 2021	Change, 2000-2021	Percent change
Thompson	\$72,543	\$81,649	+\$9,106	+12.6%
Killingly	\$64,704	\$70,728	+\$6,024	+9.3%
Woodstock	\$87,107	\$94,451	+\$7,344	+8.4%
Plainfield	\$67,482	\$68,915	+\$1,433	+2.1%
Brooklyn	\$78,356	\$79,961	+\$1,605	+2.0%
Putnam	\$67,732	\$67,070	-\$662	-1.0%
Connecticut	\$84,937	\$83,572	-\$1,365	-1.6%

The Supplemental Nutritional Assistance Program (SNAP, or food stamps) is a program available to very low-income households earning less than 130 percent of the federal poverty guideline (\$26,500 for a family of four in 2021). Throughout the state, poverty and SNAP utilization rates are higher among Black and Latino households than white households.

With many of the safety measures early in the COVID-19 pandemic, having reliable, high-speed internet at home became a necessity for remote participation in school, expanded job opportunities, and telehealth. Statewide, Black and Latino residents are slightly more likely than average to live in a household without broadband access.

Access to a personal vehicle may also be considered a measure of financial security since reliable transportation plays a significant role in job access and quality of life. Vehicle access reduces the time a family may spend running errands or traveling to appointments, school, or work.

TABLE 8: SELECTED ECONOMIC RESOURCES BY RACE/ETHNICITY, 2021

	Total		White		Black		Latino		Asian	
	Count	Share	Count	Share	Count	Share	Count	Share	Count	Share
Population living below poverty level										
Connecticut	351,476	10%	139,246	6%	64,472	17%	127,775	21%	14,134	9%
Northeastern Connecticut COG	7,607	8%	6,430	8%	N/A	N/A	N/A	N/A	N/A	N/A
Killingly	2,339	13%	2,036	13%	N/A	N/A	N/A	N/A	N/A	N/A
Population without broadband internet at home										
Connecticut	269,234	8%	159,553	7%	38,465	10%	61,883	10%	5,334	3%
Northeastern Connecticut COG	7,712	8%	6,919	8%	N/A	N/A	N/A	N/A	N/A	N/A
Killingly	1,399	8%	1,375	9%	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 9: SELECTED HOUSEHOLD ECONOMIC INDICATORS BY RACE/ETHNICITY OF HEAD OF HOUSEHOLD, 2021 (WITH PROXY AREA)

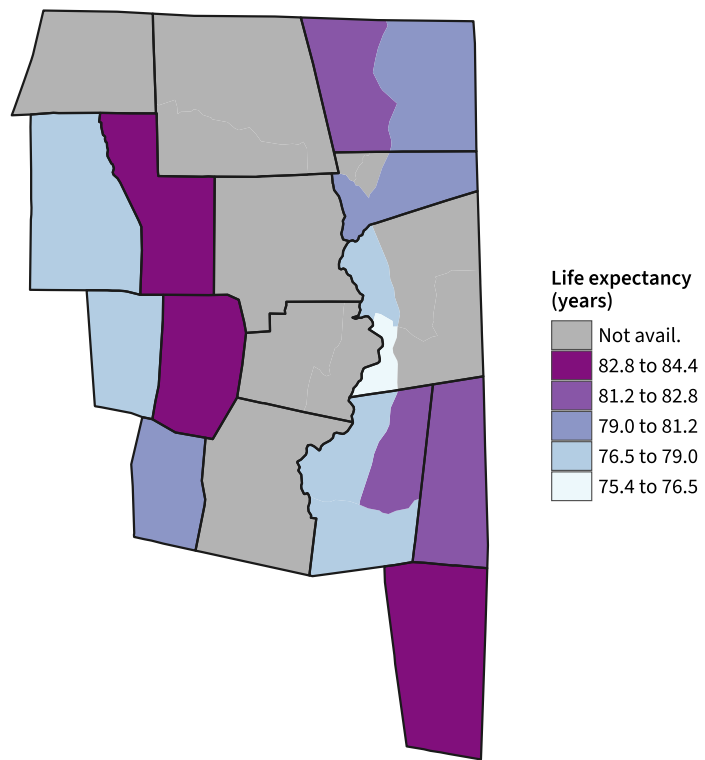
	Total		White		Black		Latino		Asian	
	Count	Share	Count	Share	Count	Share	Count	Share	Count	Share
Households receiving food stamps/SNAP										
Connecticut	160,416	11%	62,974	6%	34,132	24%	57,456	30%	3,501	6%
Northeastern Connecticut COG	4,096	11%	3,534	10%	N/A	N/A	N/A	N/A	N/A	N/A
Killingly	1,140	16%	913	14%	N/A	N/A	N/A	N/A	N/A	N/A
Households without a vehicle										
Connecticut	118,174	8%	53,628	5%	25,802	19%	31,312	16%	4,728	9%
Northeastern Connecticut COG	1,925	5%	1,765	6%	N/A	N/A	N/A	N/A	N/A	N/A
Killingly	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

HEALTH

The socioeconomic disparities described above tend to correlate with health outcomes. Factors such as stable housing, employment, literacy and linguistic fluency, environmental hazards, and transportation all impact access to care, physical and mental health outcomes, and overall quality of life. Income and employment status often drive differences in access to healthcare, the likelihood of getting preventive screenings as recommended, the affordability of life-saving medicines, and the ability to purchase other goods and services, including high-quality housing and nutritious food.

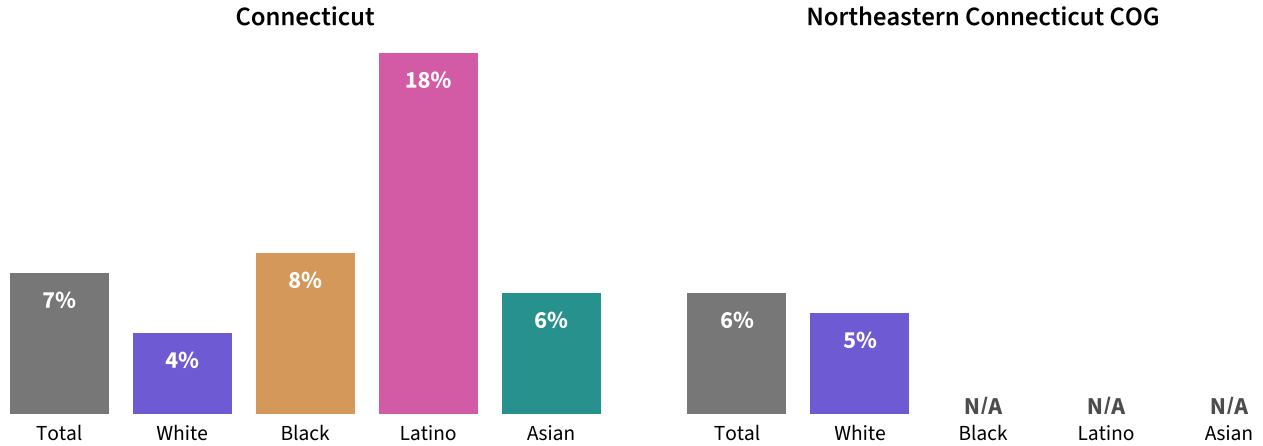
Life expectancy is a good proxy for overall health and well-being since it is the culmination of so many other social and health factors. The average life expectancy is 79.7 years in Northeastern Connecticut COG, and 80.3 years statewide. Across the region, this ranges from 77.0 years in Putnam to 84.4 in Voluntown.

FIGURE 13: LIFE EXPECTANCY, NORTHEASTERN CONNECTICUT COG BY CENSUS TRACT, 2015



Health-related challenges begin with access to care. Due to differences in workplace benefits, income, and eligibility factors, Black and especially Latino people are less likely to have health insurance than white people.

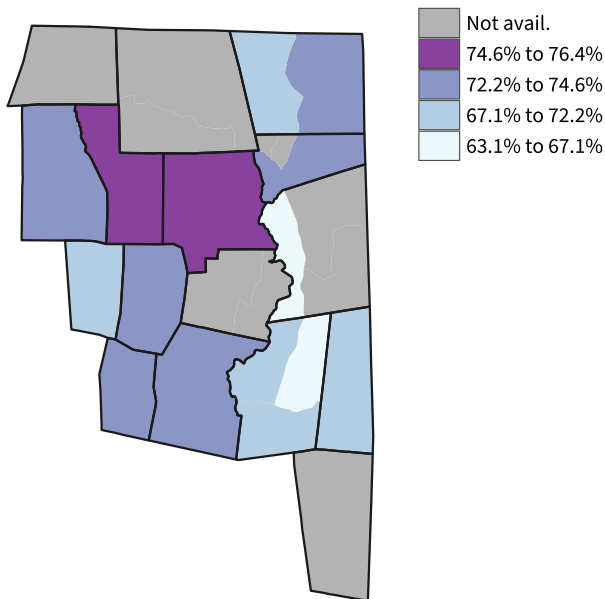
FIGURE 14: UNINSURED RATE AMONG ADULTS AGES 19–64 BY RACE/ETHNICITY, 2021



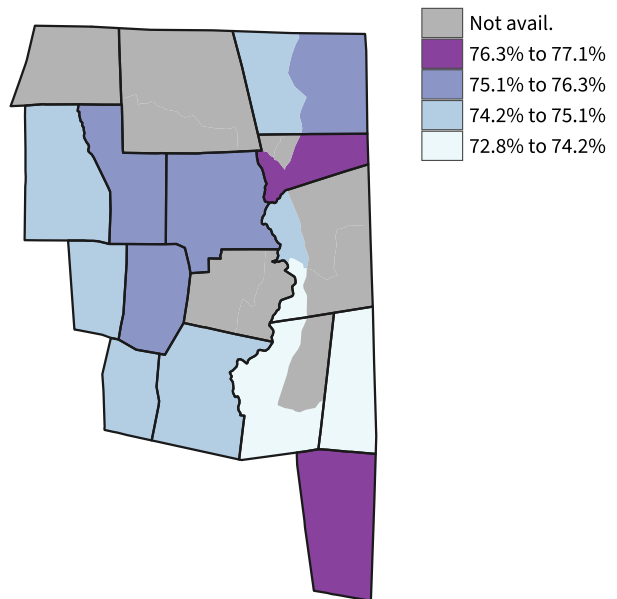
Preventive care can help counteract economic disadvantages, as a person’s health can be improved by addressing risk factors like hypertension and chronic stress early. Lack of affordable, accessible, and consistent medical care can lead to residents relying on expensive emergency room visits later on. Overall, 75 percent of the adults in Northeastern Connecticut COG had an annual checkup as of 2021, and 71 percent had had a dental visit in the past year.

FIGURE 15: PREVENTIVE CARE MEASURES, SHARE OF ADULTS BY CENSUS TRACT, NORTHEASTERN CONNECTICUT COG

Dental visit in past year, 2020



Annual checkup, 2021



Throughout the state, people of color face greater rates and earlier onset of many chronic diseases and risk factors, particularly those that are linked to socioeconomic status and access to resources. For example, diabetes is much more common among older adults than younger ones, yet middle-aged Black adults in Connecticut have higher diabetes rates than white seniors.

FIGURE 16: SELECTED HEALTH RISK FACTORS, SHARE OF ADULTS, 2015–2021

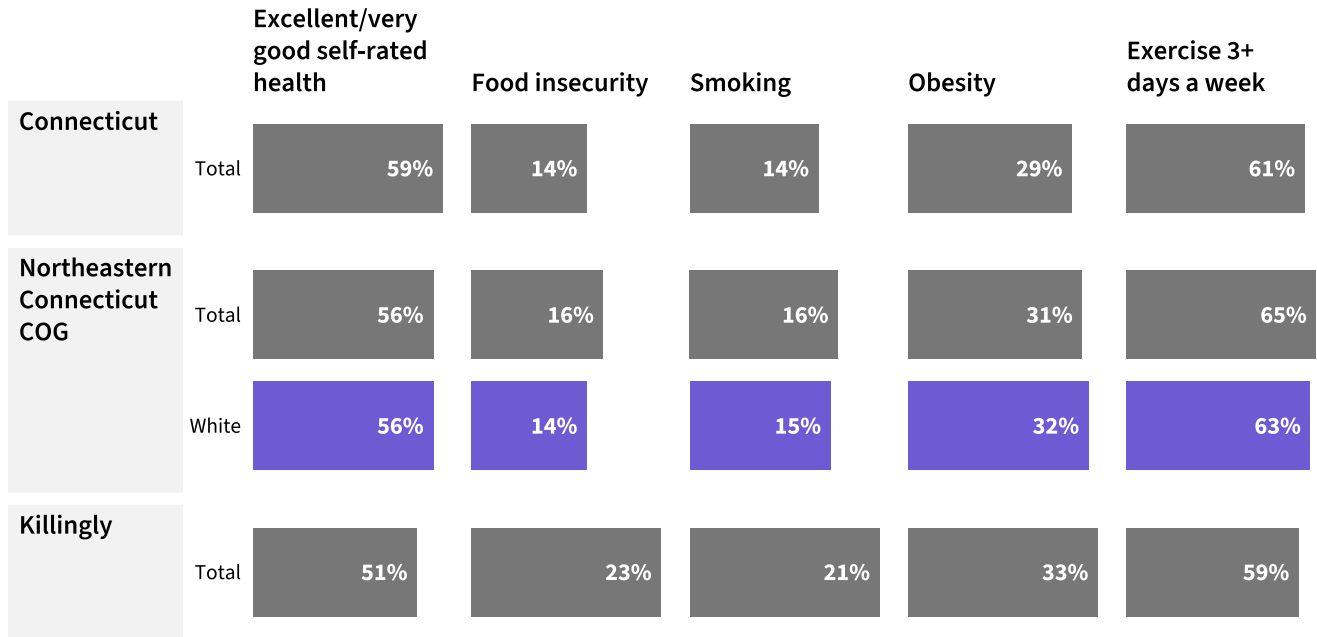
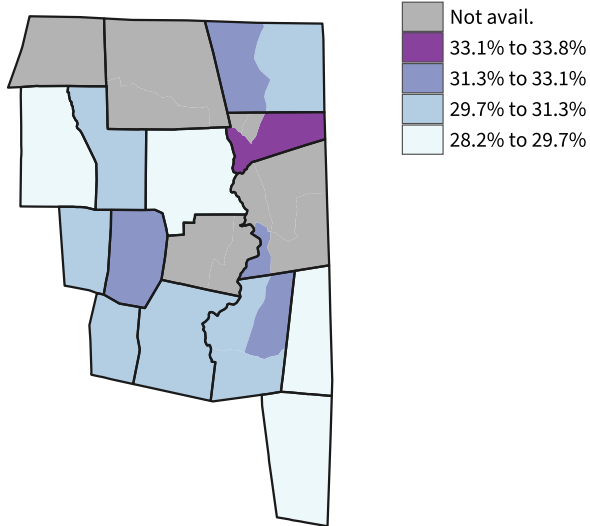
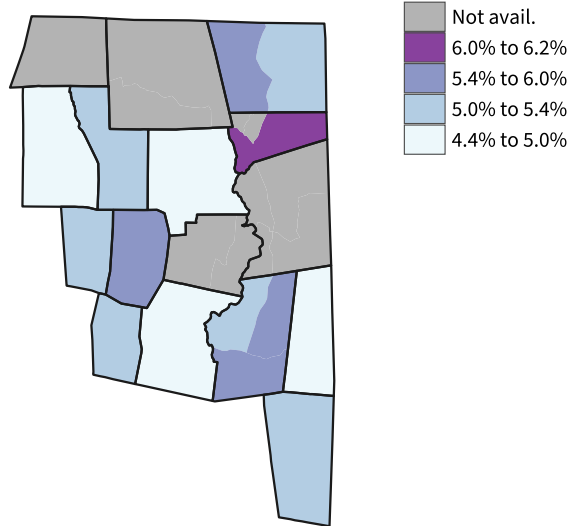


FIGURE 17: CHRONIC DISEASE PREVALENCE, SHARE OF ADULTS BY CENSUS TRACT, NORTHEASTERN CONNECTICUT COG

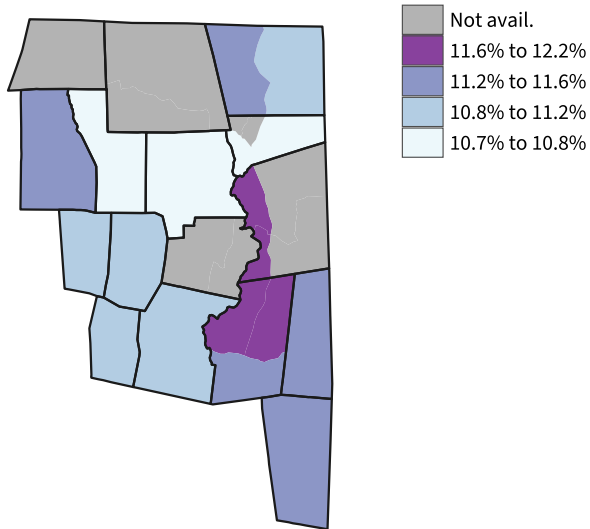
High blood pressure, 2021



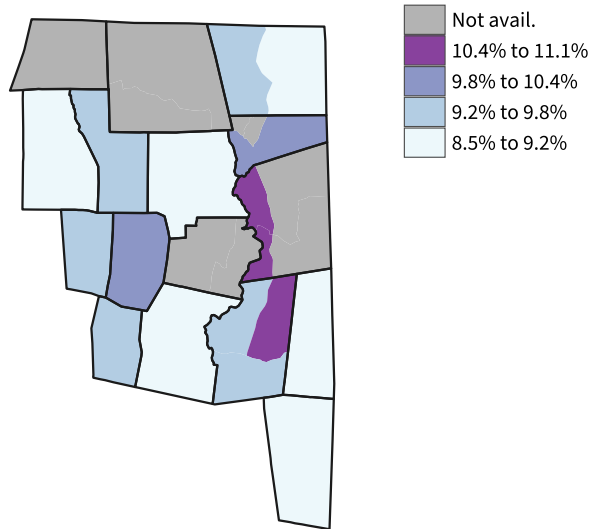
Coronary heart disease, 2021



Current asthma, 2021



Diabetes, 2021



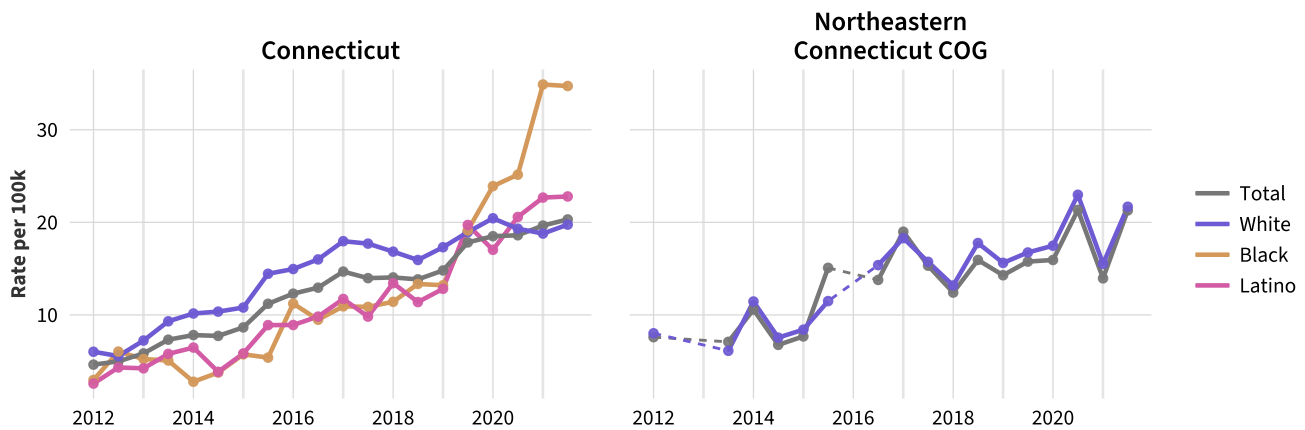
Mental health issues like depression and anxiety can be linked to social determinants like income, employment, and environment, and can pose risks of physical health problems as well, including by complicating a person’s ability to keep up other aspects of their health care. People of color are slightly more likely to report feeling mostly or completely anxious and being bothered by feeling depressed or hopeless. Overall, 10 percent of Northeastern Connecticut COG adults report experiencing anxiety regularly and 12 percent report being bothered by depression.

TABLE 10: SELECTED MENTAL HEALTH INDICATORS, SHARE OF ADULTS, 2015-2021

	Total	White	Black	Latino	Asian
Experiencing anxiety					
Connecticut	13%	11%	15%	19%	15%
Northeastern Connecticut COG	10%	11%	N/A	N/A	N/A
Killingly	17%	19%	N/A	N/A	N/A
Bothered by depression					
Connecticut	9%	8%	10%	14%	9%
Northeastern Connecticut COG	12%	9%	N/A	N/A	N/A
Killingly	18%	20%	N/A	N/A	N/A

Like other states, Connecticut has seen a rise in drug overdose deaths in the last several years. In 2021, Connecticut saw an average of 122 overdose deaths per month, up from 59 in 2015. White residents long comprised the bulk of these deaths, but as overall overdose death rates have risen, an increasing share of those deaths have been people of color.

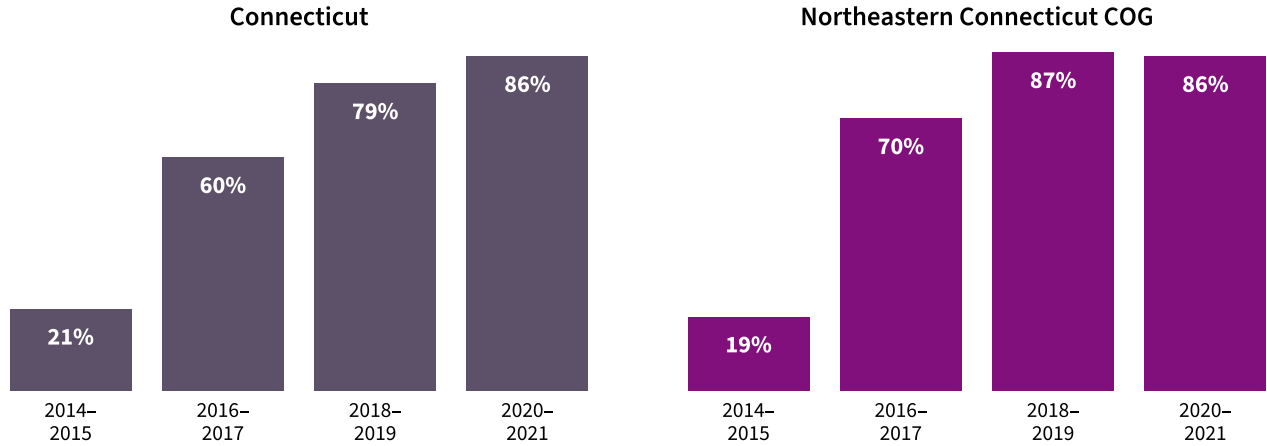
FIGURE 18: AGE-ADJUSTED SEMI-ANNUAL RATES OF DRUG OVERDOSE DEATHS PER 100,000 RESIDENTS BY RACE/ETHNICITY, 2012-2021



Note: Values are suppressed for small populations or few overdose incidents. Dashed lines indicate periods where values are suppressed or otherwise unavailable.

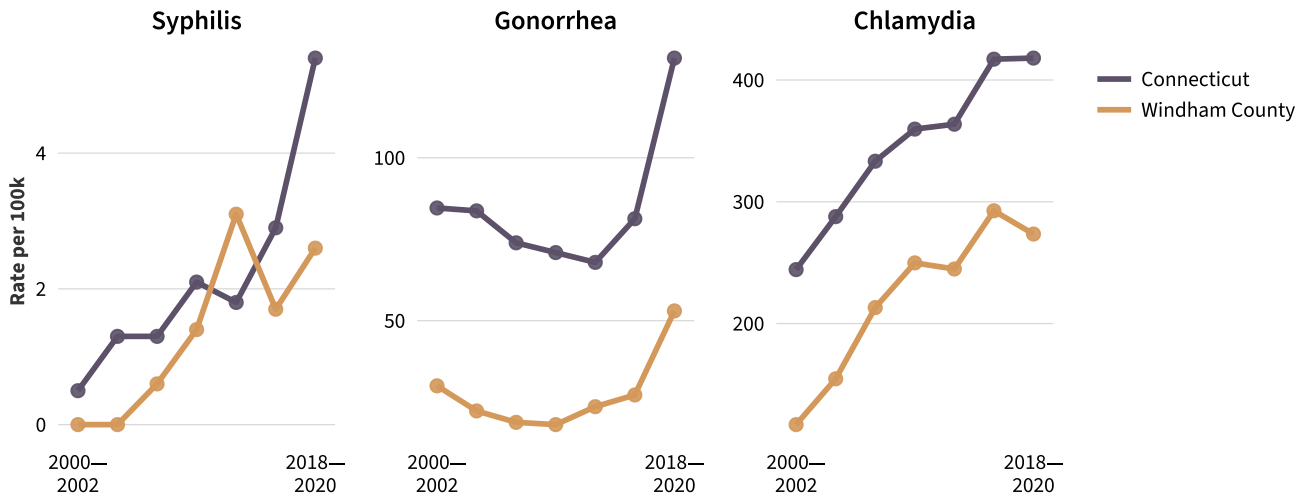
The introduction and spread of fentanyl in drugs—both with and without users’ knowledge—is thought to have contributed to this steep rise in overdoses. In 2016 and 2017, 70 percent of the drug overdose deaths in Northeastern Connecticut COG involved fentanyl; in 2020 and 2021, this share was 86 percent.

FIGURE 19: SHARE OF DRUG OVERDOSE DEATHS INVOLVING FENTANYL, 2012–2021



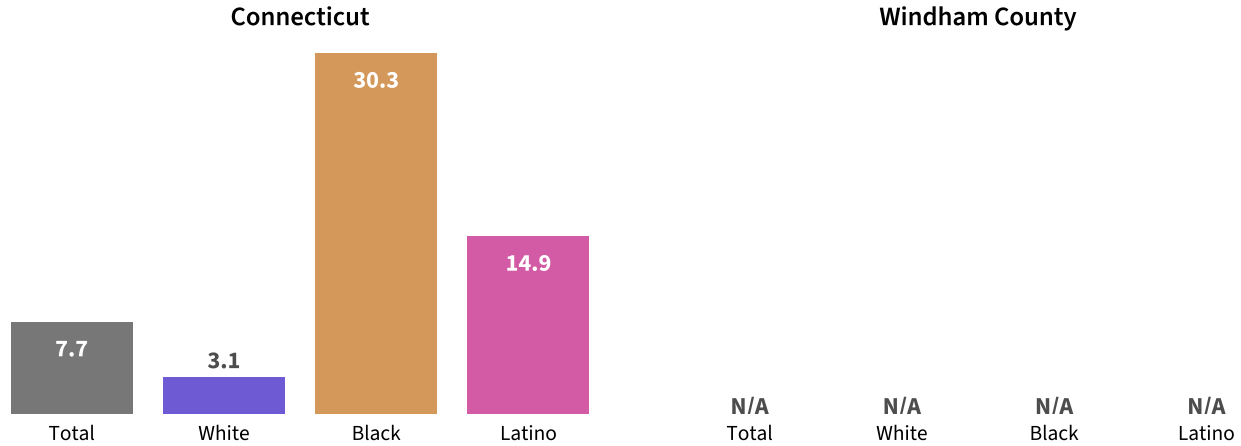
Sexually transmitted infections (STIs) can have long-term implications for health, including reproductive health problems and certain cancers, and can increase the risk of acquiring and transmitting diseases such as HIV and hepatitis C. Following nationwide trends, Connecticut has seen increases in the rates of STIs like chlamydia and gonorrhea over the past two decades. Between 2018 and 2020, Windham County had annual average case rates of 274 new cases of chlamydia per 100,000 residents, 53 cases of gonorrhea per 100,000, and 2.6 cases of syphilis per 100,000.

FIGURE 20: ANNUALIZED AVERAGE RATES OF NEW CASES OF SELECTED SEXUALLY TRANSMITTED INFECTIONS PER 100,000 RESIDENTS, 2000–2020



As with many other diseases, Connecticut’s Black and Latino residents face a higher burden of HIV rates. Statewide between 2016 and 2020, Black residents ages 13 and up were nearly 10 times more likely to be diagnosed with HIV than white residents.

FIGURE 21: ANNUALIZED AVERAGE RATE OF NEW HIV DIAGNOSES PER 100,000 RESIDENTS AGES 13 AND OVER, 2016–2020

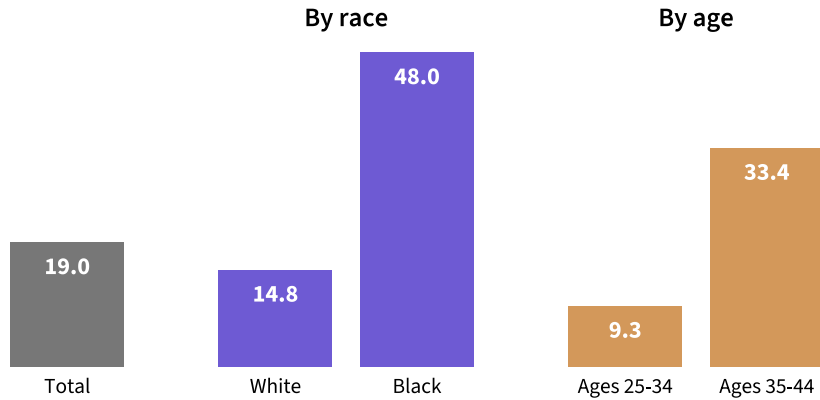


Birth outcomes often reflect health inequities for parents giving birth, and those outcomes can affect a child throughout their life. Often, parents of color have more complications related to birth and pregnancy than white parents. Complications during pregnancy or childbirth also contribute to elevated mortality among parents giving birth.

TABLE 11: SELECTED BIRTH OUTCOMES BY RACE/ETHNICITY OF PARENT GIVING BIRTH, 2017–2021

Area	Total	White	Black	Latina			Asian
				Latina (overall)	Puerto Rican	Other Latina	
Late or no prenatal care							
Connecticut	3.4%	2.5%	5.2%	4.4%	3.0%	5.6%	3.4%
Windham County	2.6%	2.3%	N/A	3.4%	3.2%	3.9%	N/A
Killingly	3.7%	4.1%	N/A	N/A	N/A	N/A	N/A
Low birthweight							
Connecticut	7.9%	6.4%	12.4%	8.4%	10.0%	7.0%	9.0%
Windham County	8.4%	8.2%	12.8%	8.9%	9.9%	7.1%	9.4%
Killingly	7.5%	7.5%	N/A	N/A	N/A	N/A	N/A
Infant mortality (per 1k live births)							
Connecticut	4.5	3.0	9.1	5.4	N/A	N/A	N/A
Windham County	4.2	3.0	N/A	N/A	N/A	N/A	N/A
Killingly	N/A	N/A	N/A	N/A	N/A	N/A	N/A

FIGURE 22: MATERNAL MORTALITY RATE PER 100K BIRTHS, CONNECTICUT, 2013–2017



Children under 7 years old are monitored annually for potential lead poisoning, based on having blood-lead levels in excess of the state’s accepted threshold. Between 2018 and 2020, 2.2 percent of children tested in Northeastern Connecticut COG were found to have elevated lead levels. Children living in homes built before 1960 are at a higher risk of potential lead poisoning due to the more widespread use of lead-based paints in older homes. Black and Latino households are more likely to live in these older buildings.

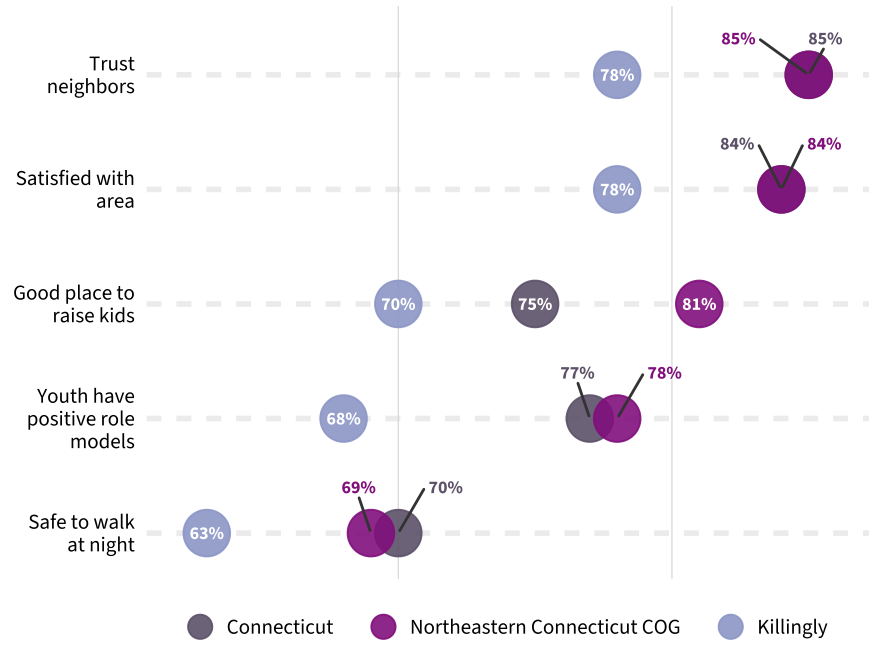
TABLE 12: HOUSEHOLDS LIVING IN STRUCTURES BUILT BEFORE 1960 BY RACE/ETHNICITY OF HEAD OF HOUSEHOLD, 2021 (WITH PROXY AREA)

Area	Total		White		Black		Latino		Asian		Other race	
	Count	Share	Count	Share	Count	Share	Count	Share	Count	Share	Count	Share
Connecticut	579,568	41%	390,197	40%	64,854	49%	95,979	50%	14,732	27%	14,953	42%
Northeastern Connecticut COG	13,513	36%	12,327	39%	N/A	N/A	1,896	52%	N/A	N/A	N/A	N/A
Killingly	2,759	39%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

CIVIC LIFE & COMMUNITY COHESION

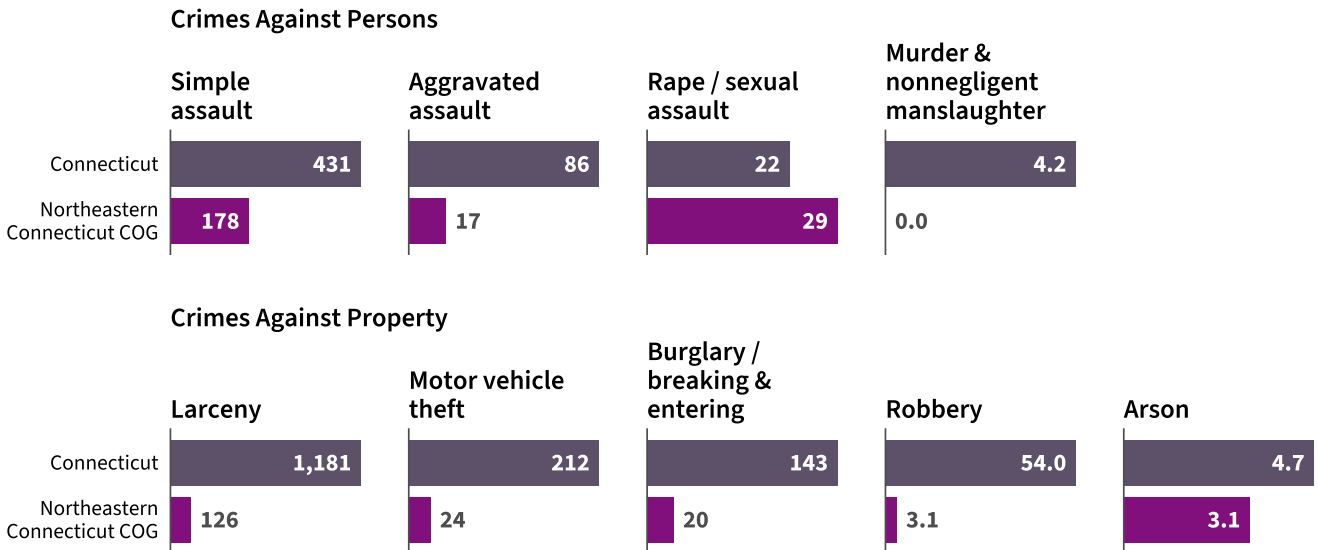
Beyond individual health, several measures from the DataHaven Community Wellbeing Survey show how local adults feel about the health of their neighborhoods. High quality of life and community cohesion can positively impact resident well-being through the availability of resources, sense of safety, and participation in civic life. For example, adults who see the availability of role models in their community may enroll their children in extracurricular activities that benefit them educationally and socially; residents who know and trust their neighbors may find greater social support. Overall, 84 percent of Northeastern Connecticut COG adults report being satisfied with the area where they live.

FIGURE 23: RESIDENTS' RATINGS OF COMMUNITY COHESION MEASURES, SHARE OF ADULTS, 2015-2021



Crime rates are based on reports to law enforcement of violent force against persons, as well as offenses involving property. Not all crimes involve residents of the areas where the crimes occur, which is important to consider when evaluating crime rates in areas or towns with more commercial activity. Crime patterns can also vary dramatically by neighborhood. Crime can impact the social and economic well-being of communities, including through negative health effects.

FIGURE 24: GROUP A CRIME RATES PER 100,000 RESIDENTS BY TOWN / JURISDICTION, 2021



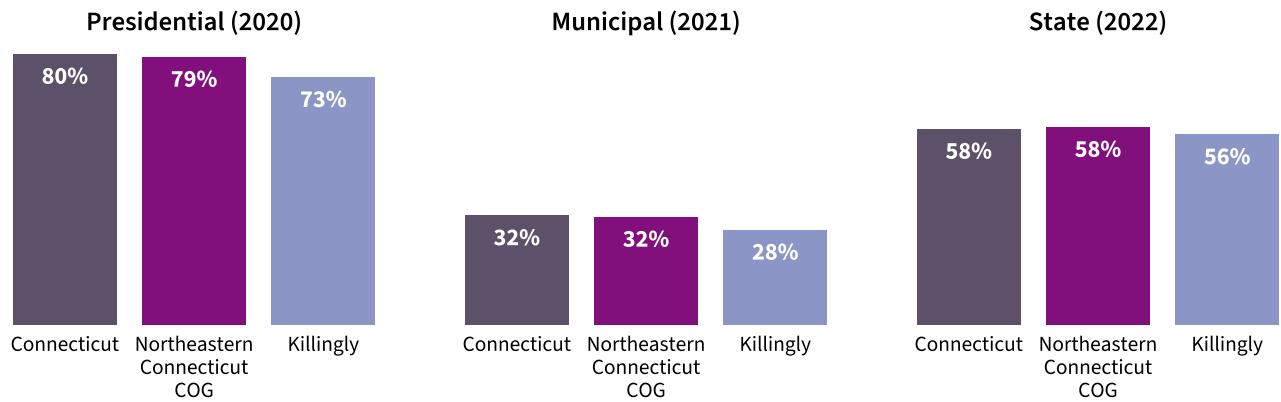
A lack of trust in and engagement with local government and experiences of unfair treatment by authorities can impair community well-being and cohesion. Fifty-two percent of adults in Northeastern Connecticut COG feel their local government is responsive to residents’ needs, compared to 53 percent of adults statewide.

TABLE 13: RESIDENTS’ RATINGS OF LOCAL GOVERNMENT, SHARE OF ADULTS, 2015–2021

Area	Local govt is responsive	Have some influence over local govt
Connecticut	53%	67%
Northeastern Connecticut COG	52%	67%
Killingly	40%	57%

Seventy-nine percent of Northeastern Connecticut COG’s eligible voters, or 52,959 people, voted in the 2020 presidential election, and 58 percent (37,548 people) voted in the 2022 state election.

FIGURE 25: REGISTERED VOTER TURNOUT, 2020–2022

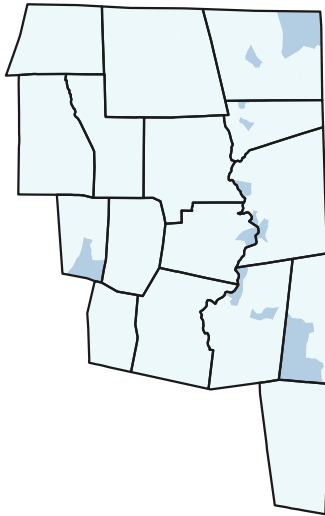


ENVIRONMENT & SUSTAINABILITY

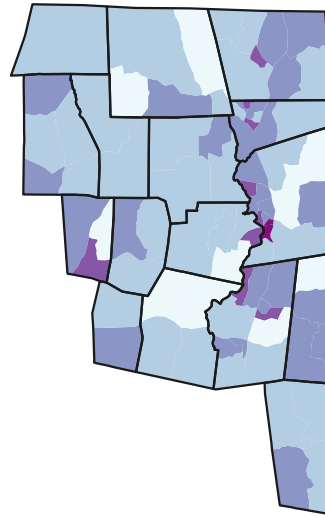
Many environmental factors—from access to outdoor resources to tree canopy to exposure to pollutants—can have direct impacts on residents’ health and quality of life. Environmental justice is the idea that these factors of built and natural environments follow familiar patterns of socioeconomic disparities and segregation. The federal Environmental Protection Agency (EPA) ranks small areas throughout the US on their risks of exposure to a variety of pollutants and hazards, scaled to account for the historically disparate impact of these hazards on people of color and lower-income people.

FIGURE 26: EPA ENVIRONMENTAL JUSTICE INDEX BY BLOCK GROUP, NORTHEASTERN CONNECTICUT COG

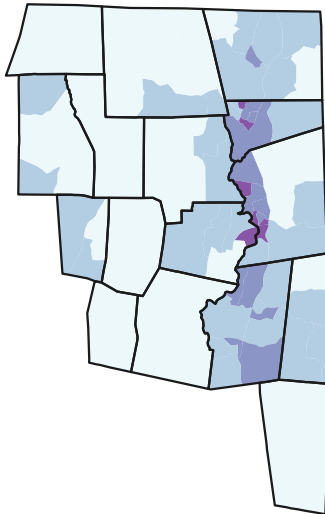
Air toxics cancer risk



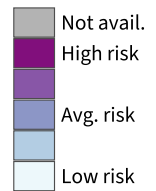
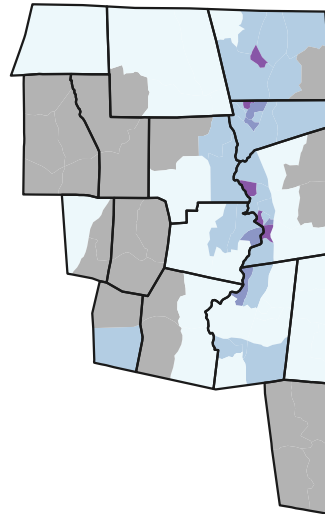
Lead paint exposure



Hazardous waste proximity

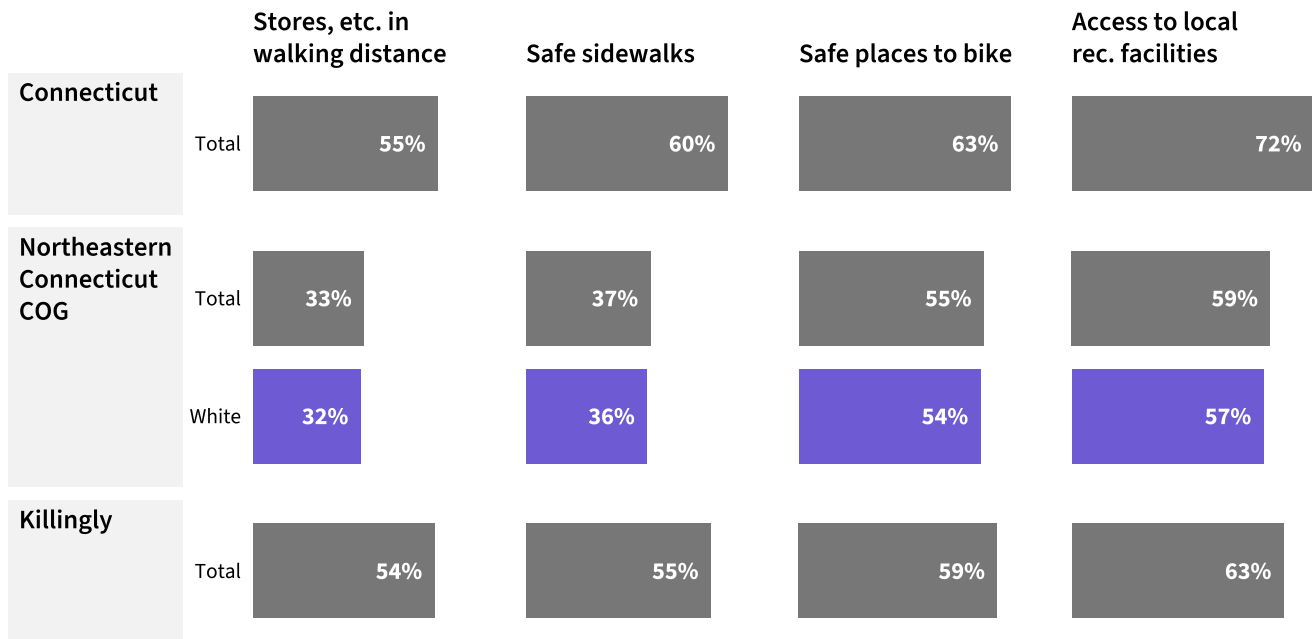


Wastewater discharge



High-quality built environment resources, such as recreational facilities and safe sidewalks, help keep residents active and bring communities together. Walkable neighborhoods may also encourage decreased reliance on cars. Throughout Connecticut, Black and Latino residents are largely concentrated in denser urban areas which tend to offer greater walkability. Of adults in Northeastern Connecticut COG, 33 percent report having stores, banks, and other locations they need in walking distance, lower than the share of adults statewide.

FIGURE 27: RESIDENTS' RATINGS OF LOCAL WALKABILITY MEASURES BY RACE/ETHNICITY, SHARE OF ADULTS, 2015–2021



NOTES

Figure 1. Study area. Map tiles by Stamen Design, under CC BY 3.0. Data by OpenStreetMap, under ODbL.

Table 1. About the area. DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year estimates. Available at <https://data.census.gov>; US Census Bureau 2020 Decennial Census P.L. 94-171 Redistricting Data. Available at <https://www.census.gov/programs-surveys/decennial-census/about/rdo.html>; PLACES Project. Centers for Disease Control and Prevention. Available at <https://www.cdc.gov/places>; and National Center for Health Statistics. U.S. Small-Area Life Expectancy Estimates Project (USALEEP): Life Expectancy Estimates Files, 2010–2015. National Center for Health Statistics. 2018. Available at <https://www.cdc.gov/nchs/nvss/usaleep/usaleep.html>. Note that for the sake of privacy, the Census Bureau suppresses any income values above \$250,000 in their tables; any such values not calculated by DataHaven will be shown as \$250,000+.

Table 2. Population by race/ethnicity, 2020. US Census Bureau 2020 Decennial Census P.L. 94-171 Redistricting Data.

Figure 2. Population by race/ethnicity and age group, 2021. DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year estimates.

Figure 3. Linguistic isolation by race/ethnicity, 2021. DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year estimates.

Table 3. Population and population change by age group, 2010–2020. US Census Bureau 2010 & 2020 Decennial Census P.L. 94-171 Redistricting Data.

Figure 4. Share of population by race/ethnicity, 2010–2020. US Census Bureau 2010 & 2020 Decennial Census P.L. 94-171 Redistricting Data.

Table 4. Homeownership rate by race/ethnicity of head of household, 2021. DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year estimates.

Figure 5. Homeownership rates by age and race/ethnicity of head of household, Northeastern Connecticut COG, 2021 (with proxy area). DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year public use microdata sample (PUMS) data, accessed via IPUMS. Steven Ruggles, Sarah Flood, Matthew Sobek, Danika Brockman, Grace Cooper, Stephanie Richards, and Megan Schouweiler. IPUMS USA: Version 13.0 [dataset]. Minneapolis, MN: IPUMS, 2023. <https://doi.org/10.18128/D010.V13.0>

Figure 6. Housing cost-burden rates by race/ethnicity, 2021 (with proxy area). DataHaven analysis (2023) of Ruggles, et al. (2023).

Table 5. Overcrowded households by race/ethnicity of head of household, 2021. DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year estimates.

Figure 7. Public K–12 student enrollment by race/ethnicity per 100 students, 2022-23. DataHaven analysis (2023) of enrollment data from the Connecticut State Department of Education, accessed via EdSight at <http://edsight.ct.gov> At the school district level, not all groups may be shown due to CTSDE data suppression rules for small enrollment counts, even though they may represent more than 1% of the school district population.

Figure 8. Selected academic and disciplinary outcomes by student race/ethnicity, 2020-21 and 2021-22 school years. DataHaven analysis (2023) of Smarter Balanced Assessment Consortium (SBAC) testing (3rd and 8th grade English/language arts), discipline, and four-year graduation data from the Connecticut State Department of Education, accessed via EdSight. Not all groups' values may be included, or in some cases may be based on estimates, due to CTSDE data suppression rules for small counts. Because students can be suspended more than once in a school year, the suspension rate represents the percentage of students with one or more suspension or expulsion during the school year.

Figure 9. Educational attainment by race/ethnicity, share of adults ages 25 and up, 2021. DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year estimates.

Table 6. Jobs and wages in Northeastern Connecticut COG's 5 largest sectors, 2021. DataHaven analysis (2023) of annual employment data from the Connecticut Department of Labor. Note that in some cases, especially for smaller towns or where data were deemed unreliable for whatever reason, data have been suppressed by the department. In a few cases, that may mean large sectors in an area are missing from the analysis here. Available at https://www1.ctdol.state.ct.us/lmi/202/202_annualaverage.asp

Figure 10. Monthly unemployment rate, 2013–2022, 3-month rolling average. DataHaven analysis (2023) of US Bureau of Labor Statistics Local Area Unemployment Statistics. <https://www.bls.gov/lau>

Figure 11. Median income by race/ethnicity and sex for full-time workers ages 25 and over with positive income, 2021 (with proxy area). DataHaven analysis (2023) of Ruggles, et al. (2023).

Figure 12. Median household income by race/ethnicity of head of household, 2021 (with proxy area). DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year estimates and Ruggles, et al (2023).

Table 7. Selected economic resource indicators by race/ethnicity, 2021. DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year estimates.

Table 8. Selected household economic indicators by race/ethnicity of head of household, 2021 (with proxy area). DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year estimates and Ruggles, et al (2023).

Table 9. Median household income in large towns, 2000–2021, in 2021 dollars. DataHaven analysis (2023) of US Census Bureau 2000 and 2010 Decennial Census; and American Community Survey 2021 5-year estimates.

Figure 13. Life expectancy, Northeastern Connecticut COG by Census tract, 2015. Data from National Center for Health Statistics. U.S. Small-Area Life Expectancy Estimates Project (USALEEP): Life Expectancy Estimates Files, 2010–2015. National Center for Health Statistics. 2018. Available at <https://www.cdc.gov/nchs/nvss/usaleep/usaleep.html>

Figure 14. Uninsured rate among adults ages 19–64 by race/ethnicity, 2021. DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year estimates.

Figure 15. Preventive care measures, share of adults by Census tract, Northeastern Connecticut COG. Data from PLACES Project. Centers for Disease Control and Prevention.

Figure 16. Selected health risk factors, share of adults, 2015–2021. DataHaven analysis (2023) of 2015, 2018, and 2021 DataHaven Community Wellbeing Survey. Available at <https://ctdatahaven.org/reports/datahaven-community-wellbeing-survey>

Figure 17. Chronic disease prevalence, share of adults by Census tract, Northeastern Connecticut COG. Data from PLACES Project. Centers for Disease Control and Prevention.

Table 10. Selected mental health indicators, share of adults, 2015–2021. DataHaven analysis (2023) of 2015, 2018, and 2021 DataHaven Community Wellbeing Survey.

Figure 18. Age-adjusted semi-annual rates of drug overdose deaths per 100,000 residents by race/ethnicity, 2012–2021. DataHaven analysis (2023) of Accidental Drug Related Deaths. Connecticut Office of the Chief Medical Examiner. Available at <https://data.ct.gov/resource/rybz-nyjw>. Rates are weighted with the U.S. Centers for Disease Control and Prevention (CDC) 2000 U.S. Standard Population 18 age group weights available at <https://seer.cancer.gov/stdpopulations>

Figure 19. Share of drug overdose deaths involving fentanyl, 2012–2021. DataHaven analysis (2023) of Accidental Drug Related Deaths. Connecticut Office of the Chief Medical Examiner.

Figure 20. Annualized average rates of new cases of selected sexually transmitted infections per 100,000 residents, 2000–2020. DataHaven analysis (2023) of data from Centers for Disease Control and Prevention. NCHHSTP AtlasPlus. Updated 2019.

<https://www.cdc.gov/nchhstp/atlas/index.htm>

Figure 21. Annualized average rate of new HIV diagnoses per 100,000 residents ages 13 and over, 2016–2020. DataHaven analysis (2023) of data from Centers for Disease Control and Prevention. NCHHSTP AtlasPlus.

Table 11. Selected birth outcomes by race/ethnicity of parent giving birth, 2017–2021. DataHaven analysis (2023) of data from the Connecticut Department of Public Health Vital Statistics. Retrieved from <https://portal.ct.gov/DPH/Health-Information--Systems--Reporting/Hisrhome/Vital-Statistics-Registration-Reports>

Figure 22. Maternal mortality rate per 100k births, Connecticut, 2013–2017. America’s Health Rankings analysis of CDC WONDER Online Database, Mortality files, United Health Foundation. Retrieved from <https://www.americashealthrankings.org>

Table 12. Households living in structures built before 1960 by race/ethnicity of head of household, 2021 (with proxy area). DataHaven analysis (2023) of US Census Bureau American Community Survey 2021 5-year estimates and Ruggles, et al (2023).

Figure 23. Residents’ ratings of community cohesion measures, share of adults, 2015–2021. DataHaven analysis (2023) of 2015, 2018, and 2021 DataHaven Community Wellbeing Survey.

Figure 24. Group A crime rates per 100,000 residents by town / jurisdiction, 2021. DataHaven analysis (2023) of 2021 Crime in Connecticut Overview By Town. Connecticut Department of Emergency Services and Public Protection. Available at <https://portal.ct.gov/DESPP/Division-of-State-Police/Crimes-Analysis-Unit/Crimes-Analysis-Unit>. Group A crimes under the FBI’s National Incident Based Reporting System are categorized into crimes against persons, crimes against property, and crimes against society. The first two of these, shown here, are similar to the Part I Offenses of the previous reporting system and shown in older reports.

Table 13. Residents’ ratings of local government, share of adults, 2015–2021. DataHaven analysis (2023) of 2015, 2018, and 2021 DataHaven Community Wellbeing Survey.

Figure 25. Registered voter turnout, 2020–2022. DataHaven analysis (2023) of data from the Connecticut Office of the Secretary of the State Elections Management System. Available at <https://ctemspublic.pctg.net>

Figure 26. EPA Environmental Justice Index by block group, Northeastern Connecticut COG. United States Environmental Protection Agency. 2022 version. EJSCREEN. Retrieved from <https://www.epa.gov/ejscreen>

Figure 27. Residents’ ratings of local walkability measures by race/ethnicity, share of adults, 2015–2021. DataHaven analysis (2023) of 2015, 2018, and 2021 DataHaven Community Wellbeing Survey.

ACKNOWLEDGEMENTS

This report is supported by a generous grant from the Emily Hall Tremaine Foundation (tremainefoundation.org). Support also comes from The Community Foundation for Greater New Haven, Yale Cancer Center, and individual donors. This report was refined through suggestions and in-kind support from Sustainable CT (sustainablect.org) as well as local organizations and residents throughout Connecticut.

Support for the DataHaven Community Wellbeing Survey (DCWS), one of the key data sources used in this report, comes from more than 80 public and private partners. Major sponsors of the DCWS include the Hartford Foundation for Public Giving, Fairfield County's Community Foundation, Connecticut Community Foundation, Valley Community Foundation, Connecticut Health Foundation, Greater Waterbury Health Partnership, Health Improvement Alliance of Greater Bridgeport, Yale-New Haven Health, Hartford HealthCare, Nuvance Health, Trinity Health of New England, Stamford Health, Griffin Hospital, City of Hartford, Ledge Light Health District, and others.

Visit DataHaven (ctdatahaven.org) for more information. This report was authored by Camille Seaberry, Kelly Davila, and Mark Abraham of DataHaven.

SUGGESTED CITATION

Seaberry, C., Davila, K., Abraham, M. (2023). Northeastern Connecticut COG Equity Profile. New Haven, CT: DataHaven. Published August 2023. More information at ctdatahaven.org

ABOUT DATAHAVEN

DataHaven is a non-profit organization with a 30-year history of public service to Connecticut. Our mission is to empower people to create thriving communities by collecting and ensuring access to data on well-being, equity, and quality of life. DataHaven is a formal partner of the National Neighborhood Indicators Partnership of the Urban Institute in Washington, D.C.

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