



**ESTUARY TRANSIT DISTRICT
SPECIAL BOARD MEETING**
ETD Offices, 91 N. Main St, Middletown, CT
with Remote Options
April 20, 2026 at 9:00 AM

AGENDA

- I. Call to Order — L. Strauss, Chair
- II. Roll Call — T. Griswold, Secretary
- III. New Business
 1. PTASP Adoption Resolution
 2. Purchasing Policy Revisions
 3. Title VI Program
 4. Scheduling Software Contract Extension
 5. Auditor's Contract Extension
- IV. Next Regular Meeting — June 12, 2026 at 9:00 AM with Remote Options
- V. Adjournment

Join Zoom Meeting

<https://us02web.zoom.us/j/87427616264?pwd=z1JNWrk3YJdV9sSMfJBfZoaNVCC5Gc.1&jst=1>

Meeting ID: 874 2761 6264

Passcode: 793114

One tap mobile

+16469313860,,87427616264#,,,,*793114# US

+19294362866,,87427616264#,,,,*793114# US (New York)

Language Assistance is available. If you need assistance, please call Chris at 860-510-0429 ext. 104 at least 48 hours prior to the meeting.

STATE OF CONNECTICUT)
)
COUNTY OF MIDDLESEX)

SS: ESTUARY TRANSIT DISTRICT
April 20, 2026

RESOLUTION NO. 26-004
BOARD OF DIRECTORS OF THE ESTUARY TRANSIT DISTRICT

WHEREAS, pursuant to 49 CFR Part 673 requires public transit agencies to adopt a Public Transit Agency Safety Plan (PTASP);

AND WHEREAS, the Federal Transit Administration updated the PTASP requirements in Docket No. FTA-2023-0007 of the Federal Register;

NOW THEREFORE, BE IT RESOLVED, the Board hereby adopts the updated Public Transit Agency Safety Plan;

RESOLVED, that Joseph Comerford, Executive Director, may execute any further documents necessary or as may be required to implement the PTASP; and

RESOLVED, that this resolution and consent be placed in the minute book of the ETD and become a part of the records of the ETD.

CERTIFICATION:

I, Timothy C. Griswold, Secretary of the Estuary Transit District (“ETD”) do hereby certify that the foregoing is a true and correct copy of a resolution adopted at its meeting on April 10, 2026 in which a quorum was present and acting throughout and that the resolution has not been modified, rescinded, or revoked and is at present in full force and effect.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Estuary Transit District this 20th day of April 2026.

Timothy C. Griswold, Secretary

Policy Bulletin #2009-01
June 19, 2009
Page 1

ESTUARY TRANSIT DISTRICT (ETD)

PURCHASING POLICY AND PROCEDURES

POLICY BULLETIN NUMBER: 2009-01 DATE OF ISSUE: July 17, 2009

DEPARTMENTS: All ETD Office Employees

BY: ETD Board of Directors Revised: ~~April 10, 2026~~ June 21, 2019

Introduction

By way of its contract with the State of Connecticut Department of Transportation, ETD is obligated to comply with FTA circular 4220.1F regarding Third Party Contracting Guidance for all procurement transactions regardless of the source of funding.

Procurement involves the entire transit organization. All of us at **ETD** are earnestly attempting to run a public transit system in an efficient and effective manner at the lowest possible cost. The Purchasing Policy and Procedures outlined in this policy bulletin are designed to help achieve that goal by setting guidelines for everyone to follow.

If you have any questions concerning these procedures, please contact the Executive Director.

Policy Bulletin #2009-01
June 19, 2009
Page 2

TABLE OF CONTENTS

I. DEFINITIONS 6

1. Approval, Authorization, Concurrence, Waiver 6
2. Best Value..... 6
3. Cardinal Change..... 6
4. Change Order 6
5. Common Grant Rules..... 6
6. Constructive Change..... 7
7. Cooperative Agreement 7
8. Corporate Purchasing Agreement 7
9. Design-Bid-Build Project..... 7
10. Design-Build Project..... 7
11. Electronic Commerce (E-Commerce)..... 7
12. Force Account 8
13. FTA 8
14. Full and Open Competition..... 8
15. Governmental Recipient 8
16. Grant..... 8
17. Joint Procurement 8
18. Local Government..... 8
19. Master Agreement..... 8
20. Non-Governmental Recipient 8
21. Project Labor Agreement (PLA)..... 9
22. Property 9
23. Public Transportation..... 9
24. Recipient 9
25. Revenue Contract..... 9
26. State..... 9
27. State or Local Government Purchasing Schedule or Purchasing Contract..... 10
28. Third Party Contract..... 10
29. Unsolicited Proposal 10
30. Value Engineering..... 11

II. CODE OF ETHICS..... 12

III. HOW TO INITIATE A PURCHASE 13

1. Approval For Expenditure 13
2. Approval Requirements Chart 13
3. Procurement Methods Chart. The following chart details which procurement method is required at each threshold of procurement. The purchase types are further explained and defined within this policy. These thresholds meet the maximums allowed by ConnDOT..... 14

THRESHOLD — PROCUREMENT METHOD..... 1414

Micro: <\$2,500 No quotes required—price reasonableness to be assessed ... 1414

Small: >\$2,500—Three written quotes 1414

<\$50,000 ——— 1414

Policy Bulletin #2009-01
June 19, 2009
Page 3

> \$50,000..... Formal Request for Proposals (RFP) or Invitation for Bids (IFB)
.....1414

IV. MISCELLANEOUS, EMERGENCY AND INCIDENTAL PURCHASES.... 15

- 1. Open Purchase Contracts with Local Business..... 15
- 2. Petty Cash Procedures..... 15
- 3. Credit Card..... 15
- 4. Gas Cards 15
- 5. Emergency Purchases (Divisions) 15
- 6. Direct Pay/Check Request Items..... 15
- 7. Electronic commerce (E-Commerce)..... 16
- 8. Capital Grant Procurement Programs. 16
- 9. Waivers and Exceptions..... 16
- 10. Fleet Fuel Procurement Policy

V. GENERAL PURCHASE PROVISIONS..... 17

- 1. Contents 17
- 2. Procurement Administration/Record Retention..... 17
- 3. DBE Contracting Policy..... 17
- 4. State and Federal Taxes 18

VI. REQUIREMENTS THAT AFFECT PROPERTY & SERVICES NEEDS.... 19

- 1. DETERMINING ETD'S NEEDS..... 19
 - a. Eligibility..... 19
 - b. Necessity 19
 - c. Procurement Size..... 20
 - d. Options. 20
 - e. Lease Versus Purchase 21
 - f. Specifications 21
- 2. FEDERAL REQUIREMENTS THAT MAY AFFECT ACQUISITIONS..... 21
 - a. Contractor Qualifications 22
 - b. Administrative Restrictions on the Acquisition of Property and Services... 25
 - c. Socio-Economic Requirements for the Acquisition of Property and Services
29
 - d. Technical Restrictions on the Acquisition of Property and Services 34
 - e. Rolling Stock—Special Requirements 35
 - f. Public Transportation Services—Special Requirements 37
 - g. Architectural Engineering (A&E) and Related Services..... 38
 - h. Construction—Special Requirements 40
 - i. Research, Development, Demonstration, Deployment, and Special Studies... 43
 - j. Audit Services 45

VII. SOURCES 47

- 1. FORCE ACCOUNT 47
- 2. SHARED USE 47
- 3. JOINT PROCUREMENTS..... 47
 - a. Use Encouraged..... 47
 - b. All FTA, Federal and State Requirements Apply 47

Policy Bulletin #2009-01
June 19, 2009
Page 14

=or>\$10,000<\$50,000	X	X	
=or>\$50,000	X		X

3. **Procurement Methods Chart.** The following chart details which procurement method is required at each threshold of procurement. The purchase types are further explained and defined within this policy. These thresholds meet the maximums allowed by ConnDOT.

THRESHOLD	PROCUREMENT METHOD
Micro: < \$15,000 10,000	No quotes required – price reasonableness to be assessed (AFE OK)
Small: >= \$15,000 10,000 < \$50,000	Three written quotes
>= \$50,000	Formal Request for Proposals (RFP) or Invitation for Bids (IFB)

Policy Bulletin #2009-01
 June 19, 2009
 Page 59

1. When to Use. After determining that no other contract type is suitable; and
 2. Firm Ceiling Price. If the contract specifies a ceiling price that the contractor may not exceed except at its own risk.
- d. **Other Requirements Affecting the Property or Services to be Acquired.**
 The solicitation and resulting contract must identify those Federal requirements that will affect contract scope and performance. *See*, Section IV, subsection 2.b of FTA circular 4220.1F, and FTA's latest Master Agreement for references to Federal requirements.
- e. **Other Requirements Affecting the Bidder/Offeror and the Contractor.**
 The solicitation and resulting contract must identify all Federal requirements that a bidder or offeror must fulfill before and during contract performance. *See*, Section IV, subsection 2.a FTA circular 4220.1F and FTA's latest Master Agreement that may reference more Federal requirements.
- f. **Award to Other Than the Low Bidder.** If ETD intends to reserve its right to award to other than the low bidder or offeror, that information should be stated in the solicitation document.
- g. **Rejection of All Bids or Offers.** If ETD intends to reserve its right to reject all bids or offers, that information should be stated in the solicitation document.
3. **METHODS OF PROCUREMENT.** ETD shall use competitive procedure(s) appropriate for the acquisition undertaken.
- a. **Micro-Purchases.** ~~FTA considers micro-purchases to be those purchases of \$3,000 or less. ETD has adopted the State Micro-purchase threshold which is currently set at \$2,500 or less. Micro-purchase means an acquisition of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold, as established in section III.3.~~
- (1) When Appropriate. ETD may acquire property and services meeting the micropurchase definition valued at \$2,500 or less without obtaining competitive quotations. These purchases are exempt from FTA's Buy America requirements. Davis-Bacon prevailing wage requirements, however, will apply to construction contracts exceeding \$2,000, even though ETD uses micro-purchase procurement procedures.
 - (2) Procedures. The following procedures apply to micro-purchases:

Policy Bulletin #2009-01
June 19, 2009
Page 60

- (a) Competition. ETD shall distribute micro-purchases equitably among qualified suppliers.
 - (b) Prohibited Divisions. ETD may not divide or reduce the size of its procurement merely to come within the micro-purchase limit, unless it is proven to be the most economically advantageous approach of procuring such items.
 - (c) Documentation. The only documentation requirement for micro-purchases is a determination that the price is fair and reasonable and a description of how ETD made its determination. Procurement by micro-purchases may be ordered from a Corporate Purchasing Agreement (CPA), state and government contract pricing, e-commerce by way of the world wide web stationary or tool catalog, or other catalog which has been determined by the Executive Director to be generally competitive in cost and quality and if it is determined that the price is fair and reasonable. ETD is not required to provide its rationale for the procurement method used, selection of contract type, or reasons for contractor selection or rejection.
- b. Small Purchases. ETD utilizes relatively simple and informal small purchase procedures as follows:
- (1) When Appropriate. Small purchase procedures may be used to acquire services, supplies, or other property valued at more than the micro-purchase threshold (~~currently, \$2,500~~) but less than \$50,000. It should be noted that although the current Federal simplified acquisition threshold is \$100,000 ETD abides by the more restrictive threshold of \$50,000 for small purchases as established by ConnDOT.
 - (2) Procedures. When using small purchase procedures the following procedures apply:
 - (a) Competition. ETD must obtain price or rate quotations from an adequate number of qualified sources. ETD encourages but does not mandate the use of a written specifications whenever in its best interest.
 - (b) Prohibited Divisions. ETD may not divide or reduce the size of its procurement to avoid the additional procurement requirements applicable to larger acquisitions.

**Estuary Transit District
Title VI Program
February 2026**

Title VI Policy Statement

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

ETD, as a recipient of federal financial assistance, will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended (42 USC Section 2000d), 49 CFR Part 21 and 23 CFR Part 200, FTA Circular 4702.1 B and related statutes and regulations in all ETD programs and activities. The Executive Director, as CEO of the district, has the overall responsibility for carrying out the district's commitment to the Title VI program.

Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color or national origin may file a Title VI complaint. Complaints may be filed directly to ETD or to the Federal Funding agency. Complaints must be filed in writing and signed by the complainant or a representative and should include the complainant's name, address, and telephone number or other means by which the complainant can be contacted. Complaints must be filed within 180 days of the date of the alleged discriminatory act.

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

Joseph Comerford
Executive Director
Estuary Transit District
91 N Main St
Middletown, CT 06457
860-510-0429 ext. 101
jcomerford@estuarytransit.org

Complaint forms can be obtained online at ETD's website www.estuarytransit.org

Federal Transit Administration (FTA) Title VI complaints may be filed directly to:

Civil Rights Officer
Federal Transit Administration
Transportation Systems Center
55 Broadway, Suite 920
Cambridge, MA 02142-1093
Telephone: 617-494-2397

Title VI Complaint Procedures

The Estuary Transit District (ETD) values diversity and welcomes and actively seeks input from all interested parties. ETD will not exclude participation in programs or services, deny benefits of, or subject to discrimination anyone on the basis of race, color or national origin. ETD actively works to ensure inclusion of everyone in the region so the programs, services and other activities of the district represent the entire population of the region.

The purpose of this document is to outline the complaint procedures that comply with Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987 and other authorizations such as E.O. 12898 regarding Environmental Justice, E.O. 13166 regarding Limited English Proficiency and other related federal and state statutes and regulations. .

A) Complaint Filing

- a. Any person who feels they have been subjected to discrimination under Title VI or other discriminatory practices may file a complaint with the ETD executive director, CTDOT or directly with FTA.
- b. A complaint must be filed within one hundred eighty (180) days of the alleged discrimination.
- c. A complaint must be in writing on the ETD Title VI Complaint Form and signed by the complainant or his/her representative, and include the complainant's name, address and telephone number. Complaints shall explain, as fully as possible, the facts and circumstances surrounding the alleged discriminatory action and individuals responsible for the alleged discriminatory action. The Title VI Officer may assist with writing a complaint if the complainant is unable to do so. The Title VI Officer shall also provide appropriate assistance to complainants, including persons with disabilities or those who are limited in their ability to communicate in English. You may contact the Title VI Officer by phone at 860-510-0429 extension 101.

B) Complaint Investigation

- a. The ETD executive director will review the complaint to determine if it is protected under Title VI.
- b. If the complaint conforms to Title VI standards and all the required information is provided, then the complaint will be accepted. If additional information is required, ETD will contact the complainant to request the additional information.
- c. Once a complaint has been accepted, ETD will notify CTDOT that a Title VI complaint is under investigation within seven (7) days.
- d. Upon completion of the investigation, the ETD executive director will report the results and findings to the Board of Directors and CTDOT.

C) Complaint Disposition

- a. All complaint and investigation correspondence will be retained by ETD.
- b. ETD will respond in writing to the complainant with the findings of the investigation within sixty (60) days of acceptance of the complaint.
- c. If the complainant disagrees with the findings, then they will be notified of the right to file a complaint with FTA offices of Civil Rights.

TITLE VI DISCRIMINATION COMPLAINT FORM

Please print out this form, fill it out and mail it to: Estuary Transit District or the Federal Transit Administration.

Name: _____

Street Address: . _____

City or Town/State/Zip Code: . _____

Phone: _____

Discrimination because of: __Race __Color __National Origin __Other

Please provide the date(s) and location of the alleged discrimination, the name(s) of the individual(s) who allegedly discriminated against you including their titles (if known).

Please provide the names, addresses and telephone numbers of any witnesses.

Explain as briefly and as clearly as possible what happened, how you feel that you were discriminated against and who was involved. Please include how other persons were treated differently from you.

Signature/Date _____

You may use additional sheets of paper if necessary. Also include any written materials pertaining to your complaint.

Address: **Joseph Comerford**
Estuary Transit District: Title VI Complaint
91 N Main Street
Middletown, CT 06457
(860) 510-0429 extension 101
jcomerford@estuarytransit.org

(Title VI Public Notice)

**Notification of Rights under Title VI
Estuary Transit District**

- The Estuary Transit District operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Estuary Transit District.
- For more information on the Estuary Transit District civil rights program, and the procedures to file a complaint, contact 860-510-0429 x101; jcomerford@estuarytransit.org; or visit our administrative office at 91 N Main St, Middletown, CT 06457. For more information, visit www.estuarytransit.org.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact Joseph Comerford, 860-510-0429 x101 or jcomerford@estuarytransit.org.

Estuary Transit District Title VI Complaint Log

Period _____

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
3.				
4.				
Lawsuits				
1.				
2.				
3.				
4.				
Complaints				
1.				
2.				
3.				
4.				

List of Title VI Posting Locations

January 2023

- All revenue vehicles
- Transit office lobby
- Bus schedules
- Website
- Passenger Terminal

Title VI Equity Analysis

Estuary Transit District did not construct any facilities during the past three years. The district does have plans for facilities, however they will be built and owned by the Connecticut Department of Transportation.

Subrecipient Title VI Monitoring

Estuary Transit District does not have any subrecipients.

EEO Program

The newly combined Estuary Transit District has more than 50 transit related employees. As a result, an abbreviated EEO program has been developed.

Public Participation Plan

I. Purpose:

The purpose of this Public Participation Plan (PPP) is to establish procedures that allow for, encourage, and monitor participation of all citizens in the Estuary Transit District's (ETD) service area, including but not limited to low income and minority individuals, and those with limited English proficiency. The intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically underserved populations to participate in accordance with Circular FTA C4702.1 A Chapter IV.

This document will lay out procedures to provide opportunities for all area citizens to participate in the development of the ETD transit services.

II. General Public Outreach and Involvement Activities

Public outreach efforts are the responsibility of the Executive Director in coordination with the ETD Board of Directors. The public outreach activities provide the public the ability to be involved in decisions concerning ETD transit services.

Board of Directors

The Board of Directors is responsible for adopting ETD's budget, major changes in transit service and fare changes. ETD is governed by a nine member board appointed in accordance with chapter 103(a) of the Connecticut General Statutes.

Transit Advisory Committee

ETD established the Transit Advisory Committee (TAC) to investigate and advise the Board of Directors on the transit needs of its citizens.

TAC consists of seven members. In addition, one Board of Directors member acts as its chairman.

ETD is "deemed a public body, and meetings of the TAC shall be subject to applicable open meetings laws." TAC functions as an advisory board to the Board of Directors on matters affecting the transit system and its operation. Continuous citizen input and advice into transit services are facilitated through the TAC.

TAC's duties and responsibilities are listed as:

- To study public transportation in the service area and to recommend to the Board of Directors and Executive Director courses of action that could be used to improve service;
- To function as an advisory body with responsibilities to advise ETD on matters affecting the transit system and its operation; including, but not limited to the following:
 - The current and future direction of the transit system;
 - Transit system problems, needs and requirements;
 - Public interest matters and concerns;
 - Quality and effectiveness of the transit system;
 - Organization, operations, and management of the transit system;
 - Rate system and bus routing;
 - Rules, regulations, and procedures;
 - Coordination of transit matters with and between other agencies as may be necessary, required or desirable; and
 - Other transit matters as necessary for the effective operation of the transit system as assigned by the Board of Directors;

Neighborhood Organizations

When ETD is considering major service changes, it complements the public meetings and advertising by notifying the neighborhood organizations that would be most affected by the changes. Neighborhood organizations are contacted by the ETD Executive Director who sets up meetings, and brings the stakeholders to the process. The neighborhood can use this opportunity to review plans, provide public feedback, and make advisory recommendations. A neighborhood membership usually reflects the demographics of the neighborhood.

III. Outreach Techniques

Outreach to the General Public

In addition to TAC and neighborhood organizations, ETD conducts broad outreach to the general riding and non-riding public on specific proposals. ETD develops proposals for new transit service, and changes to existing service, fares, etc. When developing major service changes, planning staff solicits input from a wide range of stakeholders such as the following:

- Riders of affected routes
- Residents of areas around affected routes
- Community and neighborhood organizations
- Staff and elected officials from local jurisdictions
- Major institutions and organizations
- Employers/Businesses
- Partner transit agencies

ETD gathers the information and input provided by stakeholders to develop service proposals that respond to the stakeholders' expressed needs. Service proposals often include alternatives to coverage, frequency and span.

ETD solicits input from the public through methods such as: surveys, news releases, advertisements, meetings with the general public, and meetings with stakeholders. ETD distributes surveys to riders at transit facilities, via email, via institutional and stakeholder contacts, online and on-board surveys. ETD will also accept oral comments. ETD sends news releases to major daily and community newspaper and news blogs. Notices of all proposed ETD service and fare-changes public hearings are publicized two weeks before in the Hartford Courant and ETD web site. Public hearings will be held at times and locations convenient and accessible to minority and LEP communities.

ETD uses the input provided by the public (this includes LEP, low-income, disability and minorities individuals/advocacy groups), and neighborhood organizations in developing final recommended service proposals. ETD then brings these recommendations to the TAC. With support from this committee, staff may further modify the proposal before implementing operational changes. Board action is needed for either service proposals having a budgetary impact and for all fare changes. In this case the Executive Director will bring the proposal to Board of Directors which may further modify the proposal based on public input, prior to acting on it and taking a final vote for either approval or denial. A transit fare change proposal may be reviewed by both the Finance Committee and the Board of Directors for final approval. The Board of Directors would offer opportunities for public input before taking action on the proposed fare change.

Outreach to the LEP Population

ETD's public involvement process includes outreach to members of the public whose primary languages are not English. ETD completed a four-factor analysis, based on data and community organization outreach, to ensure the agency is conducting outreach efforts around programs, activities or services important to the LEP population. The Limited English Proficiency Analysis and Plan details steps taken by ETD to reach the LEP population. This plan will be updated as new census data becomes available.

In addition to activities included in the plan, ETD will:

- Make translators available by telephone for public hearings
- Submit press releases to local Spanish language newspapers if available
- Allow both oral and written comments in a person's native language

Outreach to People with Disabilities

The ETD complies with minimum service requirements contained in 49 CFR Part 37, Subpart F, as amended, through the use of route deviations. In addition, ETD offers general public door-to-door demand response service anywhere within its service area. ETD staff conducts outreach activities to provide program information to community groups. Outreach with disability advocacy organizations is conducted through participation in meetings, hosting transit informational events with disability groups, networking with disability community groups, providing vision or hearing assistance services for events or for one-on-one needs, providing assistance for document access and training for operations staff on disability needs and customer service.

ETD staff tracks customer comments, complaints and customer service areas. ETD management reviews feedback regularly to proactively identify emerging issues and any need for additional training, as well as to evaluate individual complaints.

Outreach to People with Low Incomes

Low-income persons currently make up 6.0% of the population within ETD's service area. ETD commits to "offer a standard of living that is affordable and attainable for people of all incomes, life stages and abilities."

ETD conducts outreach and public involvement programs to support this objective. The ETD transit staff will work to provide affordable services. This will primarily be conducted through:

1. Title VI analysis of agency services and proposed changes,
2. Hosting transit informational events and
3. Customer service training of transit operations staff.

Outreach to the Minority Community

Minority persons currently make up 10.6% of the population within ETD's transit service area.

The ETD is committed to practicing nondiscrimination as specified in our Nondiscrimination Policy and in accordance with Title VI of the Civil Rights Act of 1964 (42 USC Section 200d). The outreach to minority persons within the ETD transit service area will primarily be conducted through:

1. Title VI analysis of agency services and proposed changes,
2. Outreach and networking with minority advocacy organizations
3. Hosting transit informational events and
4. Customer service training for transit operations staff.

Monitoring of Outreach Activities and Staff Training

ETD will seek out additional training tools (e.g. webinars, community organization trainings) to meet the needs of and improve customer service for disabled, low-income, and minority individuals.

ETD’s Executive Director will discuss outreach efforts for disabled, low-income, and minority individuals, according to the following with the Board of Directors:

- If assistance measures are effective in meeting the needs of disabled, low-income, and minority individuals;
- Review frequency of encounters with disabled, low-income, and minority individuals and the nature of the encounters;
- Review any complaints specifically associated with disability, low-income, or minority person’s needs;
- Review and discuss disability, low-income, and minority related trainings that occurred;
- Make incremental improvements to outreach efforts, access to information and/or staff training related to disabled, low-income, and minority persons needs;
- Discuss budgetary implications of any proposed disability, low-income, and minority related improvements; and
- Work with riders and community groups to determine whether disability, low-income, and minority measures and staff training programs are effective and appropriate.

SERVICE AND FARE CHANGES

In order to comply with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7) and Appendix C to 49 CFR part 21, ETD evaluates future significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory or disparate impact, as documented in the ETD Fare and Service Change Policy.

Transit Advisory Committee

Demographic information of members

Low Income	3	White	4
Native American/Alaska Native		Black or African American	2
Asian		Native Hawaiian/Pacific Islander	
Other		Hispanic	

TAC members are appointed by the board of directors. ETD staff attempts to identify minorities who utilize the service or represent individuals that do and recommends their appointment to the TAC. At 33%, minority representation on the TAC exceeds that of the ETD service area.

Fare and Service Change Policy

The Estuary Transit District is committed to soliciting and considering public comments when considering fare increases and service changes. As such, ETD has developed the following policy to ensure public comments are sought before imposing any fare increase or major service changes.

This policy will apply to any fare increase and any major service change. A major service change is defined as the elimination of a route, a reduction of 10% of service hours of a route, the addition of a route or the elimination of one or more timepoints on a route.

ETD will make reasonable accommodations for persons with disabilities at all public hearings with one week's notice of necessary accommodations.

Fare Changes

Should ETD wish to propose a fare increase, the ETD Board of Directors and/or ETD staff will hold a public hearing. ETD will publish notice of the hearing in the local newspaper of record (currently the Hartford Courant). The notice will include the proposed fare increase and the date, time, and location of the public hearing. The notice will be published for at least one day. ETD shall also post the same notice on all ETD buses and be sent to all member town clerks.

ETD may include the hearing as part of its regular meeting agenda, as a special meeting, or as a stand alone public hearing. The hearing will be held at a public, ADA accessible location on an ETD bus route. Minutes of the hearing will be taken. All fare increases will be presented to the Board of Directors in the form of a resolution, and may be voted on immediately following the public hearing if the Board is in legal session. If the public hearing is held at a meeting separate from that at which the fare increase will be voted on, the minutes of the hearing will be provided to the Board of Directors prior to voting.

All fare increase resolutions will be passed pending Connecticut Department of Transportation (DOT) approval. Upon adoption of the fare increase, the Chairman or Executive Director will send a written request to the DOT requesting approval of the fare increase. Following DOT approval, the increase will be implemented with at least 14 days notice to the public, which must, at minimum, be posted in all ETD vehicles.

Should ETD wish to propose a fare decrease or a discounted pre-paid fare, the Board of Directors will vote on a resolution providing for said decrease or pre-paid fare. The resolution will be passed pending DOT approval. Upon passage of the resolution, the Chairman or Executive Director will send a written request to the DOT for approval of the fare decrease or discounted pre-paid fare. No public hearing is required for such a fare change.

In order to comply with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7) and Appendix C to 49 CFR part 21, ETD evaluates future significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory or disparate impact.

All future fare changes will warrant an Equity Analysis.

- Any "fare change," as defined above, will require a public hearing and a service impact assessment.
- For future proposed changes that would increase or decrease fares or change payment type or payment media, information will be analyzed from available information (e.g. ridership

surveys) indicating whether minority and low-income riders are disproportionately more likely to use the mode of service, payment type, or payment media that would be subject to the fare increase.

Service Changes

Should ETD wish to propose a major service change, the Chairman or Executive Director shall send a written request to the DOT for said change. Upon DOT approval, ETD will schedule a public hearing. ETD will publish notice of the hearing in the local newspaper of record (currently the Hartford Courant) for at least one day. The notice will include the name of the route(s) that will be affected by the change, a brief summary of the change, and the date, time, and location of the public hearing. The same notice will be posted on all ETD buses and be sent to all member town clerks. The hearing will be held at a public, ADA accessible location on an ETD bus route. Minutes of the hearing will be taken and a copy provided to DOT.

In order to comply with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7) and Appendix C to 49 CFR part 21, ETD evaluates future significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory or disparate impact.

The ETD Board of Directors has adopted the following definition of “major services changes” for the purpose of Title VI compliance:

1. Discontinuation of existing fixed-route service to any part of the ETD service area, including elimination of an existing route or route segment and/or replacement of fixed-route service with demand-response service.
 2. Replacement of public demand-response service in an area with a fixed-route.
 3. Discontinuing service on weekend days and/or holidays, even if such discontinuation does not exceed the threshold in Item #7 below.
 4. Implementation of a new route.
 5. Systemwide service reduction or increase involving 15% or more of total route miles or service hours.
 6. Reducing the span of service on any route (i.e., eliminating first and/or last trips).
 7. Reducing the revenue miles and/or hours of service on any route by 20% or more.
- Route changes will be analyzed by listing:
 - Existing route miles versus existing route miles preserved resulting in a percent change for each route; and
 - Existing route miles versus miles extended resulting in a percent miles extended for each route.

If the elimination of current routing or establishment of new routing show a major service change as defined above, then a Service Equity Analysis will be performed. With the exception of any demand response, pilot or temporary service.

ETD staff will consider the public comments prior to making a final decision on the change. Notice of the changes will be posted on all ETD buses at least 14 days prior to the change. Updated schedules will be printed and distributed at least 7 days prior to the change.

Service Equity Analysis

Service Equity Analysis will analyze the disparate impacts to minority and low income populations. ETD’s disparate impact policy is as follows:

When the percentages for impacted minority and/or low-income populations are higher than 15% of the service area average for these populations, impacts are considered disproportionate.

- ETD uses census data at the tract or block group level depending on data availability to determine the route-level impacts. Routes with “major service changes” will be mapped, showing the individual route, the segment of the route that would be eliminated or any established new routing, overlaid on a demographic map of the route area, that highlights those census tracts where the total minority and low-income population is greater than 15% of the service area average. Route changes and span of service changes are quantified separately, per guidelines provided in FTA Circular 4702.1A.

- Using these figures, percentages for impacted minority and low-income populations are recalculated for each change on each route as follows:
 - $\text{Minority or Low-income Population} / \text{Total Population} = \text{Percentage of Minority or Low-income Population within tract}$
 - The percentages are then compared to the district’s service area averages for minority and low income populations.
 - When the percentages for impacted minority and low-income populations are higher than 15% of the service area average for these populations, impacts are considered disproportionate.

Limited English Proficiency Analysis and Plan

ETD has conducted a four factor analysis to determine what steps are necessary to provide meaningful access for persons with limited English proficiency (LEP). ETD used 2010 U.S. Census data for all of the service area was used to conduct the analysis.

ETD first looked at the number and proportion of LEP persons served or encountered in the eligible service population. ETD looked first at its participating towns, for which it found that of 154,483 persons ages five or over, 5,170, or 3.3%, spoke English less than “very well”. Of this group, 2,125, or 1.38%, spoke Spanish, 145 French, Haitian and Cajun, 53 German, 784 Russian, Polish or Other Slavic languages, 145 Other Indo-European languages, 412 Gujarati, Hindi, Urdu and other Indic languages, 168 Chinese, 40 Vietnamese, 14 Thai, 111 Other Asian languages, 85 Tagalog, 6 Hungarian, 46 Arabic and 11 African languages.

ETD also has very limited service in New London. In this census tract, 2.58% of residents age 5 or over are Spanish speaking and speak English less than “very well”, though ETD makes only four total stops. ETD also has two stops in downtown New London. This census tract had 3,517 persons, or 13.68%, Spanish speaking persons who spoke English less than “very well”.

An attempt was made to determine literacy rates among LEP individuals in the area. We were only able to locate statewide information, and were therefore unable to narrow it to the ETD service area.

ETD next reviewed the frequency with which LEP individuals come into contact with its services. For this information, ETD consulted its customer service agents and bus operators. Customer service agents reported few phone calls from persons with limited English proficiency, which was supported by the low usage (1-3 calls per month) of our translation services. Bus operators, however, reported regular contact with Spanish speaking persons.

ETD also considered the nature and importance of the services provided. Since ETD provides public transportation, and the majority of the trips are for work, education, or medical purposes, it was determined that ETD’s services are extremely important to both those who utilize them and those who do not currently but may one day need to.

Finally, ETD reviewed the cost for providing outreach service to LEP persons. ETD looked at printing schedules in alternative languages, telephone translation services, and document translation services.

After analyzing these four factors, ETD determined that though the current number of Spanish speaking persons with limited English proficiency is small, they are overrepresented as users of the system.

ETD has determined that despite the cost of translation, it makes business sense to make many documents available in Spanish. This includes schedules and other marketing materials and the Title VI policy statement.

In addition, ETD has contracted for translation service by telephone. This service is charged by the minute used, so there is no cost if it is not utilized. It will be available to LEP persons at no charge as needed. Staff will be trained to utilize the translation services as needed.

Language translation will also be available by request at board meetings and public hearings. This is also a pay per use service. After four years of offering translation, it has not been requested. Therefore, the benefit has outweighed the cost of providing such service.

ETD will review these four factors when updated census data becomes available or when a change in service changes the service area.

ETD/MTD Combined Organization Chart

April 2022



