

Easter Seals New Hampshire Inc.
Title VI Plan

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I. INTRODUCTION

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM'S COMMITMENT TO CIVIL RIGHTS

The development of **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** Title VI Program has been prepared to ensure that the level and quality of **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM'S DEMAND RESPONSE SERVICES FOR THE ELDERLY AND DISABLED** are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's** riders and other community members. Additionally, through this program, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

While it is a matter of principle that **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's** services on the basis of race, color, or national origin the contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency) and other statutes and authorities that prohibit discrimination in Federally assisted programs and activities.

"No person shall, on 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 assistance." - Civil Rights Act of 1964

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** has an obligation to ensure that:

- ◆ The benefits of its bus services are shared equitably throughout the service area;
- ◆ The level and quality of bus services are sufficient to provide equal access to all riders in its service area;
- ◆ No one is precluded from participating in **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's** service planning and development process;
- ◆ Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population; and
- ◆ A program is in place for correcting any discrimination, whether intentional or unintentional.

II. GENERAL REQUIREMENTS

Notice to the Public

To make **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** riders, the general public and staff aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** has presented the plan and information in English and Spanish on its website on how to file a complaint. **EASTER SEALS NEW HAMPSHIRE** has also posted the notice on its transit vehicles and in the lobby of its transportation operations office.

Your Civil Rights

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act and other statutes and authorities that prohibit discrimination in Federally assisted programs and activities. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title IV may file a complaint with **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**. For more information on **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s civil rights program and the procedures to file a complaint, please contact **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** at 603-606-3111; email at Froberge@eastersealsnh.org, or visit our administrative office at 180 Zachary Road, Manchester, NH from 9AM-5PM. A complaint may be filed directly with FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. For more information about **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** and services, visit <http://www.easterseals.com/nh/our-programs/special-transit-service/>. If information is needed in another language, please contact **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** by calling 603-668-8603.

Discrimination Complaint Procedures

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** may file a Title IV complaint by completing and submitting the agency's Title VI Complaint available at our administrative offices or on our website <http://www.easterseals.com/nh/our-programs/special-transit-service/>

EASTER SEALS NEW HAMPSHIRE will notify NHDOT of all formal complaints within five business days of receiving the complaint.

Easter Seals Transportation Complaint Form

It is the policy of Easter Seals New Hampshire Transportation program to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, The Civil Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibit discrimination in Federally assisted programs and require 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 receiving Federal assistance.

Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes in receiving Easter Seals New Hampshire Transportation services may file a written complaint to the following address:

Fred Roberge, Title VI Coordinator Easter Seals Transportation Program
180 Zachary Road
Manchester, NH 03109
Phone: (603) 668-8603
Fax: (603) 64-9794

More information about transit-related civil rights requirements may be found on the FTA's website at www.fta.dot.gov.

Note: Apart from the form, *on separate pages*, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Important: We cannot accept your complaint without a signature, so please sign on the last page of the form after printing out.

Section I

I believe that I have been (or someone else has been) discriminated against on the basis of:

- Race / Color / National Origin
- Disability
- Not Applicable
- Other (specify): _____

I believe that Easter Seals Transportation Program has failed to comply with the following program requirements:

- Disadvantaged Business Enterprise (DBE)
- External Equal Employment Opportunity
- Not Applicable
- Other (specify): _____

Section II

Name: _____

Street Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Numbers:

Home: _____

Cell: _____

E-Mail Address: _____

Accessible format requirements:

- Large Print
- Not Applicable
- Other (specify): _____

Section III

Are you filing this complaint on your own behalf? Yes No

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

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party: Yes No

Please sign here: _____

Date: _____

Note: We cannot accept your complaint without a signature.

The Procedure

If you believe that you have received discriminatory treatment by the EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM on the basis of race, color or national origin, you have the right to file a complaint with the EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM **by contacting Fred Roberge, Vice President.**

Methods of filing a complaint:

Complete the Complaint Form, and send it to:

Fred Roberge, Vice President
180 Zachary Road
Manchester, NH 03109

Verbal complaints are accepted and transcribed by **Fred Roberge**. To make a verbal complaint, call 603-606-3111 and ask for **the Vice President**.

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM investigates complaints received no more than **180 days after** the alleged incident. **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** will process complaints that are complete. Once the complaint is received, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**.

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM has up to **thirty days** to investigate the complaint. If more information is needed to resolve the case, the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** may contact the complainant. The complainant has thirty days from the date of the letter to send requested information to the investigator assigned to the case.

If **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s investigator is not contacted by the complainant or does not receive the additional information within thirty days, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, one of two letters will be issued 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.

A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If

the complainant wishes to appeal the decision, she/he has ten days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at:
 Federal Transit Administration
 Office of Civil Rights
 1200 New Jersey Avenue SE
 Washington, DC 20590

Active Lawsuits, Complaints or Inquiries Alleging Discrimination

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** that allege discrimination on the basis of race, color or national origin. This list includes the date that the transit-related 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 **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** in response, or final findings related to the investigation, lawsuit, or complaint.

As of the writing of this program, there are 0 complaints pending which allege discrimination on the grounds of race, color, national origin or any other form of discrimination.

Active Lawsuits, Complaints or Inquiries Alleging Discrimination

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken
None				

III. EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM'S PUBLIC PARTICIPATION PLAN

Key Principles

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's** service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can and will influence **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's** decision making;
- The concerns of all participants involved will be considered in the decision-making process; and,
- **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** will seek out and facilitate the involvement of those potentially affected.

Through an open public process, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** has developed a Public Participation Plan to encourage and guide public involvement efforts and enhance access to **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's** transportation decision-making process by minority and Limited English Proficient (LEP) populations. The Public Participation Plan describes the overall goals, guiding principles and outreach methods that **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** uses to reach its riders.

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.
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Limited English Proficient (LEP) Goals of the Public Participation Plan

The overarching goals of **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's** PPP include:

- Clarity in Potential for Influence - The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
- Consistent Commitment - **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** communicates regularly, develops trust with riders and our community and builds community capacity to provide public input.
- Diversity - Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low-income neighborhoods, ethnic communities, and residents with Limited English Proficiency.

- Accessibility - Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- Relevance - Issues are framed in such a way that the significance and potential effect is understood by participants.
- Participant Satisfaction - People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- Partnerships - **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** develops and maintains partnerships with communities and the Greater Manchester Regional Transportation Council, through the methods described in its public participation plan.
- Quality Input and Participation - Comments received by **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** are useful, relevant and constructive, which contribute to better plans, projects, strategies, and decisions.

Objectives of the Public Participation Plan

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's Public Participation Plan is based on the following principles:

- Flexibility - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- Inclusiveness - **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** will proactively reach out to and engage low income, minority, and LEP populations from the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** service area.
- Respect - All feedback will be given careful and respectful consideration.
- Proactive and Timeliness - Participation methods will allow for early involvement and be ongoing.
- Clear, Focused, and Understandable - Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
- Honest and Transparent - Information provided will be accurate, trustworthy and complete.
- Responsiveness – **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** will respond and incorporate appropriate public comments into transportation decisions.
- Accessibility – Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public, and in locations relevant to the topics being presented and discussed.

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM will accommodate and encourage public participation by utilizing the following methods:

- Provide transportation to meetings when needed and possible.
- Work with the Southern NH Planning commission, the lead agency for the Regional Transportation Council, to facilitate communication with targeted groups or individuals of the Greater Manchester area. Methods for outreach will be through email, telephone communication, public notices, and communication with advocacy groups, the Governor's Commission on Disability and the NH Bureau of Elderly and Adult Services.
- Consider request for meeting with the concerned public at a venue of their choice.

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM will use its public participation plan when considering changes, major modifications to service delivery, and other transit planning projects when:

- Advance reservation for demand response service is significantly changed;
- A new transportation service is established;
- An existing service is proposed for elimination;
- Considering the total discontinuance of service; or
- For minor service changes not rising to the level of those above, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** will directly communicate with consumers when they contact our schedulers for service.

Regional Partnership/Capital Program

For its capital program, including bus procurements, **EASTER SEALS TRANSPORTATION PROGRAM** follows the requirements of the funding agency. Vehicles are procured through the New Hampshire Department of Transportation, which requires that a public notice be published regarding **EASTER SEALS TRANSPORTATION PROGRAM**'s intent to apply for vehicles. If the NH-DOT requires additional public input to the process, **EASTER SEALS TRANSPORTATION PROGRAM** will follow the Department's guidelines.

IV. EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM'S PUBLIC PARTICIPATION PROCESS

Outreach Efforts – Alerting Riders and Encouraging Engagement

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's PPP includes many mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** maintains these elements to its outreach program along with traditional seat-drop flyers, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** has availed itself of the communication methods more widely used by members of our community and riders.

While there may be minor variation in the outreach process from time-to-time, the outline below provides the general steps for engaging riders in the decision-making process using a service change as an example.

1. A service change proposal is developed internally or as a result of public comment;
2. An internal review by the appropriate committees is conducted;
3. Proposals are reviewed by the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's management**. A Title VI review of the proposal is conducted;

4. If required, authorization from the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** Board of **Directors or Agency Chief Executive Officer** is sought to proceed to a public comment;
5. Public outreach venues, dates, and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** service area;
6. Public outreach materials and a program are developed;
7. Outreach in advance of public information sessions is released (using tool-box of mediums listed below);
 1. An email is transmitted to **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** community partners and the Greater Manchester Regional Coordination Council;
 2. Local radio station(s);
 3. The public comment period ends;
 4. The final service change date is set;
 5. Outreach is conducted in advance of any service change.

Selection of Meeting Locations

When determining locations and schedules for public meetings, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** will work with the Greater Manchester Regional Coordination Council to:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ different meeting sizes and formats including town hall type meeting formats;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Consider radio, television, or newspaper ads as well as podcasts that serve LEP populations;
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments.

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM Mediums

- Print – Newspapers and other periodicals
- Social Media – EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM has used Facebook since 2017 to help engage community
- Radio
- On-board Flyers – EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM uses flyers to provide riders with details of service changes

- Direct Mail to Community Partners
- Public Information Sessions
- Public Hearings in conjunction with the Greater Manchester Regional Transportation Council
- Legal Notices
- Direct communication with consumers

Addressing Comments

The Incorporation of Public Comments into Decisions

All comments received through the public participation plan are given careful and thoughtful consideration. As there are a number of different ways riders or members of the community can comment on proposed service all comments are assembled into a single document for presentation to the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** management for consideration.

Identification of Stakeholders

Our Community Partners

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of the plan. Those who may be adversely affected, or who may be denied benefits of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority persons, low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s community stakeholders can be obtained by contacting **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**.

Stakeholder List

Any community organization or person can be added to the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** stakeholder list and receive regular communications regarding service changes by contacting the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** administrative office at 603-668-8603. Local organizations and businesses can also request that a speaker from **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** attend their regular meeting at the same number or through the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** website <http://www.easterseals.com/nh/our-programs/special-transit-service>

V. Decision Making Bodies

Board of Directors

At **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**, decisions regarding policies, programming and facility locations are made by the Easter Seals New Hampshire Chief Executive Officers and is overseen by the Easter Seals New Hampshire Board of Directors. **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM's Board of Directors** is composed of 24 members. The Easter Seals Board of Directors solicits input from all programs and integrates meeting consumers for program feedback development at agency Board meetings. Transportation was highlighted last at the October 2018 meeting.

Service Review Committee

This employee-based internal committee is comprised of Transportation Management Staff, Scheduling and Dispatching staff and seeks input from Drivers involved in the provision of service to seniors and people with disabilities. The Service review committee meets as needed to discuss service delivery for system consumers, stakeholders.

Passenger Advisory Committee (PAC)/ Greater Manchester Regional Transportation Council (RCC)

A Passenger Advisory Committee (PAC) will be assembled as needed to help to guide decisions regarding service delivery and other topics important to the community and our riders. The Easter Seals Meetings of the **(PAC)** will always be open to the public and held at the Greater Manchester Regional Transportation Council (RCC). Meetings will be held at the fully accessible Southern New Hampshire Planning Commission at 438 Dubuque Street, Manchester, NH 03102 or at other locations deemed accessible by Easter Seals and the RCC. The Regional Transportation Council meets no less than quarterly and more often as necessary. The RCC has a history of working with community groups, the public and consumers to design and develop programing. All meetings are open to the public.

	Caucasian	African American	Hispanic	Asian	Race 4	Race 5
Board of Directors	24					
Service Review Committee	4		2			

VI. SUMMARY OF CHANGES

Service Change Evaluations Since February 2017

Since **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** has developed a 2017 Title VI Plan Submission, there have been **no changes** in **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s service provision structure since the development of this policy.

Future changes, the associated outreach, Title VI determination, and **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** management approval explaining any changes will be available by contacting **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**.

Program Specific Requirements

Title VI Monitoring (from February 2017 Title VI Plan)

The results of the ongoing monitoring of service standards as defined in the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s February 2017 program can be obtained by contacting **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**.

Demographic Service Profile

As **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** operates fewer than 50 buses in peak service, a demographic service profile was not prepared for this plan update.

VII. GRANTS, REVIEWS AND CERTIFICATIONS

Pending Applications for Financial Assistance

Easter Seals transportation funding from the NH Department of Health and Human Services is scheduled for a one-year extension effective July 1, 2020, to continue to provide transportation utilizing Title III B funds.

Civil Rights Compliance Reviews in the Past 3 Years

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM has not been the subject of any such reviews since its 2017 plan submission.

Recent Annual Certifications and Assurances

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM executed its most recent Certifications and Assurances to the NH DOT in 2020.

Contact

For additional information on the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Fred Roberge, Vice President

Easter Seals Transportation Program

180 Zachary Road

Manchester NH 03109

VIII. LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency (LEP)

In order to ensure meaningful access to programs and activities, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** to determine if it communicates effectively with LEP persons and informs language access planning.

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**;
2. The frequency with which LEP persons come into contact with **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** services and programs;
3. The nature and importance of **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s services and programs in people's lives; and
4. The resources available to **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** for LEP outreach, as well as the costs associated with that outreach.

Factor 1 – Number of LEP Persons in Service Region

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** evaluated the level of English literacy and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey. Data was reviewed by **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s board, advisory committee, city leaders in its entirety.

Service Area Overview

***EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s service area encompasses approximately 607.57 square miles and is home to a population speaking more than 28 different languages. Of the total service area population of 328,671, 3.8% of residents report speaking English less than very well. The most populous groups in the category are shown below. Of the remaining populations, those reporting English "less than very well" range from 0% to 1.3% of the total service area population.*

Speak English "Less than Very Well"	Population in the Language Group (5 years and over)	Percent of the Total Population (5 years and over)
Spanish	4,247	1.3%
Other Indo-European languages	1,975	0.6%
French, Haitian, or Cajun	1,481	0.5%
Russian, Polish, or other Slavic languages	960	0.3%
Vietnamese	953	0.3%
Arabic	850	0.3%
Chinese (including Mandarin, Cantonese)	700	0.2%
Other and unspecified languages	568	0.2%
Other Asian and Pacific Island languages	479	0.1%
Tagalog (including Filipino)	211	0.1%
Korean	116	0.0%
German or other West Germanic languages	87	0.0%

Factor 2 – Frequency of LEP Use

There are a few places where **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** riders and members of the LEP population can come into contact with **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** services, including the use of demand response services, calls to customer service representatives, and **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s outreach materials. An important part of the development of **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s Language Access Plan is the assessment of major points of contact, including:

- The use of the bus service;
- Communication with **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s customer service staff;
- Printed outreach materials;
- Web-based outreach materials;
- Public meetings;
- Demand response reservation agents;
- Referral from Human Service agencies or information and referral programs

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM will distribute a language survey to its employees. The objective of the survey is to evaluate the needs of **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** customers who are not able to communicate in English. The first question asked, In What Way(s) Do You Interact with **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** Riders? The chart below will illustrate the results.

Method of Interaction	Percent of Responses
Telephone	67%
Face to Face	33%
Email	
Fax	

Next, the survey asked how often employees come into contact with LEP customers. The chart below outlines the results.

Frequency of Interaction	Percent of Responses
Often	25%
Sometimes	50%
Rarely	25%
Never	

Next, the survey asked employees to identify how often they interact with the following languages on a typical workday.

Language	Percent of Interactions
Hispanic	5%

The survey asked, overall, how effective employees are in communicating with Limited English Proficient **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** passengers. The results are summarized below.

Effectiveness	Percent of Total Responses
Very Effective	25%
Moderately Effective	25%
Less Effective	50%
Unable to Communicate	

Community Partners

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM will also canvass its community partners to assess the extent to which they came into contact with LEP populations. Community partners were surveyed by The Greater Manchester Regional Coordination Council for Community Transportation by The Southern NH Planning Commission and were asked the following questions:

1. Do you encounter non-English speaking/reading people who need your services?
2. If so, what are the top three languages that you encounter?
3. How do you address language barriers?
4. Do you find language to be a barrier in preventing you from providing service?

Results of the survey will be posted here

QUESTION	MTA	RNMOW	Catholic Charities (CareGivers)	Gr. Salem CareGivers	Manchester Cmty Health Ctr	St. Joseph Cmty Services
Do you encounter non-English speaking/reading people who need your services?	Yes	No	No	Not really	Yes- 45% of our 17,000 patients speak a language other than English at home	No
If so, what are the top three languages that you encounter?	Spanish and French no other request.	No	N/A	N/A	1. Spanish 2. Nepali Arabic	N/A
How do you address language barriers?	MTA ensures our website and all public materials are available in Spanish and French Google Translate, vehicle tablets	Language barriers addressed through procedures to do so. Chart of languages, language bank	Have not encountered any	N/A	We have 12 interpreters on staff, 50% of our 230 staff are bilingual, and have contracts for other interpreters for languages not on staff	Language bank as needed.
Do you find language to be a barrier in preventing you from providing service?	No.	No	No	No	No	No

Consulting Directly with the LEP Population

In addition to the U.S. Census data, employee survey, and outreach to community partners, EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM will implement a survey of its riders. A copy of the survey is attached in Appendix A.

Factor 3 – The Importance of EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM Service to People’s Lives

Access to the services provided by **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** is critical to the lives of many in the service area. Many depend on **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**’s services for access to essential community services

like shopping and medical appointments. Because of the essential nature of the services and the importance of these programs in the lives of many of the region's residents, there is a need to ensure that language is not a barrier to access.

During our last consumer survey (July 2020), the following information regarding service quality and language needs was collected:

Office and Dispatch-

100% found it easy to schedule a ride

100% found the individual scheduling the ride pleasant and helpful

100% overall were satisfied with the scheduling process

Drivers/Service-

100% stated that the vehicle gets to appointments on time

100% found the driver polite and Courteous

100% found the driver to be helpful

94% found the vehicle clean and in good working order

When considering their total experience 100% stated that they were satisfied with the drivers and service.

100% stated their native language was English, that they were White and born in the United States.

If limited English proficiency is a barrier to using these services, then the consequences for the individual could limit their access to obtain health care or other essential services targeted at keeping them independent. Critical information from **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** which can affect access includes:

- Eligibility and other Information regarding making the best use of the system (How To)
- Complaint and comment forms
- Information about demand response services targeted at elderly and disabled that are provided by Easter Seals

The following notice will be posted on all EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM vehicles under contract to provide community transportation.

The **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** ensures that no person shall, on the grounds of race, color, or national origin, be excluded from participating in or denied benefits of or be subjected to discrimination as it relates to the provision of public transportation services provided by the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**.

Any person who wants additional information on **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s nondiscrimination obligation or believes that he or she individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a complaint with the **EASTER SEALS NEW**

HAMPSHIRE TRANSPORTATION PROGRAM within 180 days of the date of the alleged discrimination.

To file a complaint, contact **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** at 603-668-8603, <http://www.easterseals.com/nh/> or send a letter to 180 Zachary Rd, Manchester NH 03109. A complaint may be filed directly with the FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Factor 4 – Resources and Costs for LEP Outreach

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM has committed resources to improving access to its services and programs for LEP persons.

Today, bilingual information (**English/Spanish**) is available, including the following:

- ◆ A multilingual English/100 Language(s) website using Google Translate
- ◆ Translation services available with Ascentria Care Alliance Language Bank
- ◆ Bilingual English/Spanish customer service representatives
- ◆ Bilingual English/Spanish trainers for **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** drivers.
- ◆ Bilingual English/Spanish drivers

To date, the costs associated with these efforts fit within the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s budget.

Outcomes

Tools and alerting riders of language assistance

Following the “Four Factor Analysis”, **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** concluded that, while there is currently outreach and materials for the Language(s) speaking LEP population of the service area, additional services are provided to assist other LEP populations should they be needed, regardless of the total population in the region. These include:

1. Google Translate to the **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** website;
2. Translation services for telephone communications with customer service representatives;
3. Staff charged with improveing community engagement through coordinated outreach with the Greater Manchester Regional Coordination Council.

The above tools are available for the benefit of LEP populations in our service area. Easter Seals transportation staff is fully engaged with the Greater Manchester Regional Transportation Council, serving in an officer's capacity.

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM is considering all of these items and other methods that become available.

Oversight

Monitoring, Evaluating and Updating the Language Assistance Plan and Public Participation Process

The monitoring of the Language Assistance Plan will include:

- ◆ Annual reviews of regional census data for changing patterns of LEP populations;
- ◆ Update the policy after one year to include survey information and thereafter every three years;
- ◆ Ongoing collaboration with regional partners and the Greater Manchester Regional Coordination Council;
- ◆ Ongoing review of Google Translate requests at **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM**'s website; and
- ◆ Post Event Assessments (PEA)

Post-Event Assessments

Following service changes and planning projects, the Vice President of Transportation will assess the effectiveness of public involvement against the goals established in this plan. This assessment will ask the questions:

- ◆ Did the public know there was an opportunity to participate?
- ◆ Was the purpose of the participation clearly articulated to the public?
- ◆ Did the public have access to appropriate resources and information to allow for meaningful participation?
- ◆ Did the decision-making process allow for consideration and incorporation of public input?
- ◆ Were there complaints about the public engagement process?
- ◆ Were the public engagement efforts cost effective?
- ◆ What additional methods could have been employed to improve the process?
- ◆ Should the Public Participation Process or Language Assistance Plan be amended?

Training Employees

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM conducts ongoing and new employee training on how to use LEP translation services that are available to serve the public and how to respond to passengers of services and documents available for LEP populations. **EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM** also conducts training for office staff on how to use translation services. Training program includes the following objectives:

- Employee awareness training for the ability to basically communicate with the LEP and low-literacy populations.
- Overview of Civil Rights legislation and agency requirements as a FTA section 5310 recipient; and
- Review of Easter Seals Transportation Program Title VI policy.

Translation of Vital Documents

EASTER SEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM will provide translation of documents or provide translation service for LEP consumers as needed. The list of documents that will be translated is provided below:

- ◆ Civil Rights Complaint Form
- ◆ Transportation Information Brochure