



Easterseals New Hampshire Inc.  
Title VI Plan

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# I. INTRODUCTION

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## EASTERSEALS NEW HAMPSHIRE TRANSPORTATION PROGRAM COMMITMENT TO CIVIL RIGHTS

The Easterseals New Hampshire Transportation Program Title VI Program has been prepared to ensure that Easterseals NH Transportation Program 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 Easterseals NH Transportation Program riders and other community members. Additionally, the Easterseals NH 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.

It is a matter of principle that Easterseals NH 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 Easterseals NH Transportation Program 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), Easterseals NH 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 provided equally to all riders in its service area;
- ◆ No one is precluded from participating in Easterseals NH Transportation Program service planning and development process;
- ◆ Decisions regarding service changes or facility locations are made without regard to race, color or national origin. Further that the development and urban renewal projects benefitting a community not be unjustifiably sited based on the disproportionate allocation of 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 Easterseals NH Transportation Program riders, the general public and staff aware of its commitment to Title VI compliance, and the right to file a civil rights complaint, Easterseals NH Transportation Program has presented the plan and information on how to file a complaint in both English and Spanish on its website. Easterseals NH has also posted the notice inside its transit vehicles and in the lobby of its transportation operations office.

### **Your Civil Rights**

Easterseals NH 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 Easterseals NH Transportation Program. For more information on Easterseals NH Transportation Program civil rights program and the procedures to file a complaint, please contact Lisa Ludwigsen, Business Manager of the Easterseals NH Transportation Program at (603) 263-2046 or email at [ludwigsen@eastersealsnh.org](mailto:ludwigsen@eastersealsnh.org); or visit our administrative office at 180 Zachary Rd, Manchester, NH 03109, from 8AM-5PM Monday through Friday. The Operations Manager can also be contacted at (603) 668-8603.

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 Easterseals NH Transportation Program and services, visit <http://www.easterseals.com/nh/our-programs/transportation/>. If information is needed in another language, please call the Easterseals NH Transportation Program Operations Department at (603) 668-8603.

### **Discrimination Complaint Procedures**

Easterseals NH 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 Easterseals NH 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/transportation/>

Easterseals NH will notify NHDOT of all formal complaints within five business days of receiving the complaint.

## Easter Seals New Hampshire Transportation Program 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:

Lisa Ludwigsen, Title VI Coordinator Easter Seals New Hampshire Transportation Program  
180 Zachary Rd  
Manchester, NH 03109  
Phone: (603) 668-8603  
Fax: (603) 624-9794

More information about transit-related civil rights requirements may be found on the FTA's website at [www.fta.dot.gov](http://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:** 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:**

- Title VI of the Civil Rights Act of 1964 (Title VI)
- Americans with Disabilities Act (ADA)
- 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: \_\_\_\_\_

## **The Procedure**

If you believe that you have received discriminatory treatment by the Easterseals NH Transportation Program on the basis of race, color or national origin, you have the right to file a complaint with the Easterseals NH Transportation Program by contacting Lisa Ludwigsen, Business Manager or the Operations Manager.

### **Methods of filing a complaint:**

Complete the Complaint Form, and send it to:

Lisa Ludwigsen, Business Manager, Title VI Coordinator  
Easterseals NH Transportation Program  
180 Zachary Road  
Manchester, NH 03109

Or:

Operations Manager  
Easterseals NH Transportation Program  
180 Zachary Road  
Manchester, NH 03109

Verbal complaints are accepted and transcribed by Lisa Ludwigsen. To make a verbal complaint, call (603) 263-2046 to speak with Lisa Ludwigsen. Verbal complaints are also accepted by the Operations Manager – please call (603) 668-8603.

Easterseals NH Transportation Program investigates complaints received no more than 180 days after the alleged incident. Easterseals NH Transportation Program will process complaints that are complete. Once the complaint is received, Easterseals NH Transportation Program will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by Easterseals NH Transportation Program.

Easterseals NH Transportation Program has up to thirty days to investigate the complaint. If more information is needed to resolve the case, the Easterseals NH 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 Easterseals NH Transportation Program investigator is not contacted by the complainant or does not receive the additional information within thirty days, Easterseals NH Transportation Program 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, 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:

FTA Office of Civil Rights  
 Attention: Title VI Program Coordinator  
 East Building, 5th Floor-TCR,  
 1200 New Jersey Ave., SE, Washington, DC 20590

**Active Lawsuits, Complaints or Inquiries Alleging Discrimination**

Easterseals NH Transportation Program maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming Easterseals NH 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 Easterseals NH Transportation Program in response, or final findings related to the investigation, lawsuit, or complaint.

As of the writing of this program, there have been no complaints that 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

### **III. EASTERSEALS NH TRANSPORTATION PROGRAM PUBLIC PARTICIPATION PLAN**

#### **Key Principles**

Easterseals NH Transportation Program Public Participation Plan (PPP) ensures that no one is precluded from participating in Easterseals NH Transportation Program service planning and development process. It ensures that:

- Stakeholders have an opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution influences Easterseals NH Transportation Program decision making;
- The concerns of all participants involved are considered in the decision-making process; and,
- Easterseals NH Transportation Program seeks out and facilitates the involvement of stakeholders.

Through an open public process, Easterseals NH Transportation Program has developed a Public Participation Plan to encourage and guide public involvement efforts and enhance access to Easterseals NH Transportation Program 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 Easterseals NH 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.

#### **Limited English Proficient (LEP) Goals of the Public Participation Plan**

The overarching goals of Easterseals NH Transportation Program 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 - Easterseals NH 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 - Easterseals NH 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 Easterseals NH Transportation Program are useful, relevant and constructive, which contribute to better plans, projects, strategies, and decisions.

### **Objectives of the Public Participation Plan**

Easterseals NH Transportation Program 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 - Easterseals NH Transportation Program will proactively reach out to and engage low income, minority, and LEP populations from the Easterseals NH 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 – Easterseals NH 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.

Easterseals NH 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 requests for meetings from stakeholders at a venue of their choice.

Easterseals NH 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, Easterseals NH 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, Easterseals NH Transportation Program follows the requirements of the funding agency. Vehicles are procured through the New Hampshire Department of Transportation (NHDOT), which requires that a public notice be published regarding Easterseals NH Transportation Program's intent to apply for vehicles. If the NHDOT requires additional public input to the process, Easterseals NH Transportation Program will follow the Department's guidelines.

## **IV. EASTERSEALS NH TRANSPORTATION PROGRAM PUBLIC PARTICIPATION PROCESS**

### **Outreach Efforts – Alerting Riders and Encouraging Engagement**

Easterseals NH Transportation Program PPP includes many mediums beyond the traditional approach that relied on legal notices, intermittent media coverage and seat drop flyers. Easterseals NH Transportation Program has also availed itself of communication methods more widely used by 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 Easterseals NH Transportation Program management. A Title VI review of the proposal is conducted;
4. If required, authorization from the Easterseals NH Transportation Program Board of Directors or Agency Chief Executive Officer is obtained 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 Easterseals NH 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);
  - a) An email is sent to Easterseals NH Transportation Program community partners and the Greater Manchester Regional Coordination Council;
  - b) Local radio station(s);
  - c) The public comment period ends;
  - d) The final service change date is set;
  - e) Outreach is conducted in advance of any service change.

### **Summary of Previous Activities**

There have been no new activities to report as of yet.

### **Selection of Meeting Locations**

When determining locations and schedules for public meetings, Easterseals NH 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 outreach 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.

### **Easterseals NH Transportation Program Communication Mediums**

- Print – Newspapers and other periodicals
- Social Media – Easterseals NH Transportation Program has used Facebook since 2017 to help engage community
- Radio
- On-board Flyers – Easterseals NH 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**

### **Incorporation of Public Comments into Decisions**

All comments received through the public participation plan are given careful and thoughtful consideration. All comments, irrespective of how submitted, are assembled into a single document for presentation to and consideration by Easterseals NH Transportation Program management.

### **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 public, marginalized/underrepresented people, low-income people, public agencies, as well as private organizations and businesses. While stakeholders may vary based on the plan or program being considered, Easterseals NH Transportation Program has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of Easterseals NH Transportation Program community stakeholders can be obtained by contacting Easterseals NH Transportation Program.

#### **Stakeholder List**

Any community organization or person can be added to the Easterseals NH Transportation Program stakeholder list and receive regular communications regarding service changes by contacting the Easterseals NH Transportation Program administrative office at (603) 668-8603. Local organizations and businesses can also request that a speaker from Easterseals NH Transportation Program attend their regular meeting at the same number or through the Easterseals NH Transportation Program website:  
<http://www.easterseals.com/nh/our-programs/transportation/>

## **V. DECISION MAKING BODIES**

### **Board of Directors**

At Easterseals NH Transportation Program and associated policy decisions, programming and facility locations choices are made by the Easterseals New Hampshire Chief Executive Officer and are overseen by the Easterseals New Hampshire Board of Directors.

### **Service Review Committee**

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

	<b>Caucasian</b>	<b>African American</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Other</b>
<b>PAC/RCC (# of members/attendance varies)</b>	10				1
<b>Service Review Committee</b>	4		2		

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

A Passenger Advisory Committee (PAC) is activated as needed to help guide decisions regarding service delivery and other topics important to the community and our riders. The Easterseals NH PAC meetings are always open to the public and held at the Greater Manchester Regional Transportation Council (RCC) or at the fully accessible Southern New Hampshire Planning Commission or at other locations deemed accessible by Easter Seals and the RCC. The RCC 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 programming. All meetings are open to the public.

## **VI. SUMMARY OF CHANGES**

### **Service Change Evaluations Since November 2020**

There have been no changes in Easterseals NH Transportation Program service provision structure since 2020 Title VI Plan Submission.

Future changes, the associated outreach, Title VI determinations, and Easterseals NH Transportation Program management approval explaining any changes will be available by contacting Easterseals NH Transportation Program.

### **Program Specific Requirements**

#### **Title VI Monitoring** (from November 2, 2020 Title VI Plan)

The results of the ongoing monitoring of service standards as defined in the Easterseals NH Transportation Program November 2, 2020 submission can be obtained by contacting Easterseals NH Transportation Program.

### **Demographic Service Profile**

As Easterseals NH 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**

Easterseals NH transportation contract funding from the NH Department of Health and Human Services is scheduled to continue utilizing Title III B funds until June 30, 2024.

### **Civil Rights Compliance Reviews in the Past 3 Years**

Easterseals NH Transportation Program has not been the subject of any such reviews since its 2020 plan submission.

### **Recent Annual Certifications and Assurances**

Easterseals NH Transportation Program executed its most recent Certifications and Assurances to the NHDOT on February 7, 2023.

### **Contact**

For additional information on the Easterseals NH 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:

Lisa Ludwigsen, Business Manager  
Easterseals NH Transportation Program  
180 Zachary Road  
Manchester, NH 03109

Or:

Operations Manager  
Easterseals NH 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, Easterseals NH Transportation Program uses the information obtained in a “Four Factor Analysis” to determine the specific language services that are indicated. This analysis helps Easterseals NH Transportation Program to assess the effectiveness of its communications with persons with LEP and informs language access planning.

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of persons with LEP eligible to be served or likely to be engaged by Easterseals NH Transportation Program;
2. The frequency with which persons with LEP come into contact with Easterseals NH Transportation Program services and programs;
3. The nature and importance of Easterseals NH Transportation Program services and programs in people’s lives; and
4. The resources available to Easterseals NH Transportation Program for LEP outreach, as well as the costs associated with that outreach.

#### **Factor 1 – Number of Persons with LEP in Service Region**

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of persons with LEP who may engage Easterseals NH Transportation Program 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, Easterseals NH 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 completed in 2023 (information covers 2017 to 2021 as a 5year estimate). Data was reviewed by Easterseals NH Transportation Program, advisory committee, and city leaders in its entirety.

## **Service Area Overview**

Easterseals NH Transportation Program service area is in Region 8. Currently our areas of transport encompass Manchester, Hooksett, Bedford, and Goffstown. The total combined service area population is 338,541, of which 300,305 residents report they speak only English. The populations that speak English less than “very well”, thus meeting the Safe Harbor Threshold are Spanish, French/Haitian/Cajun, and Other Indo-European languages. Of the areas we are currently servicing, there are 162,003 residents, with 134,659 of the residents reporting they speak only English, and of the remaining 27,344 residents, 14.11% of those residents’ report speaking English less than very well. The largest percentage of those residents, at 3.79% speak Spanish. As a result, Easterseals NH employs several bilingual Spanish-speaking staff in our operations facility so that clients can communicate without barriers and see themselves represented on our team, and has the Title VI Notice and Title VI Complaint Form translated into Spanish, which are also available on the website. There have been no requests for any other written translations in other languages. If requested, Easterseals NH would offer written translation.

<b>Region 8</b>	<b>Combined Service Area</b>	<b>Combined Service Area</b>
<b>Label</b>	<b>Estimate</b>	<b>Percent of Population</b>
Total:	338,541	
Speak only English	300,305	
Spanish:	13,610	37.01%
Speak English "very well"	8,566	27.09%
Speak English less than "very well"	5,044	9.92%
French, Haitian, or Cajun:	5,969	23.54%
Speak English "very well"	4,341	19.27%
Speak English less than "very well"	1,628	4.27%
German or other West Germanic languages:	957	5.90%
Speak English "very well"	846	5.12%
Speak English less than "very well"	111	0.78%
Russian, Polish, or other Slavic languages:	2,138	4.78%
Speak English "very well"	1,264	2.91%
Speak English less than "very well"	874	1.87%
Other Indo-European languages:	7,758	25.14%
Speak English "very well"	5,451	20.55%
Speak English less than "very well"	2,307	4.59%
Korean:	152	0.70%
Speak English "very well"	65	0.42%
Speak English less than "very well"	87	0.28%
Chinese (incl. Mandarin, Cantonese):	1,234	4.05%
Speak English "very well"	723	2.83%
Speak English less than "very well"	511	1.22%
Vietnamese:	1,174	1.81%
Speak English "very well"	319	0.80%
Speak English less than "very well"	855	1.01%
Tagalog (incl. Filipino):	520	2.51%
Speak English "very well"	408	2.27%
Speak English less than "very well"	112	0.23%
Other Asian and Pacific Island languages:	1,413	4.07%
Speak English "very well"	1,121	3.57%
Speak English less than "very well"	292	0.50%
Arabic:	1,765	4.86%
Speak English "very well"	1,001	3.59%
Speak English less than "very well"	764	1.27%
Other and unspecified languages:	1,546	2.46%
Speak English "very well"	995	1.83%
Speak English less than "very well"	551	0.63%

## **Factor 2 – Frequency of LEP Use**

There are a few places where Easterseals NH Transportation Program riders and people with LEP can come into contact with Easterseals NH Transportation Program services, including the use of demand response services, calls to customer service representatives, and Easterseals NH Transportation Program outreach materials. An important part of the development of Easterseals NH Transportation Program Language Access Plan is the assessment of major points of contact, including:

- The use of the bus service;
- Communication with Easterseals NH Transportation Program 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.

Easterseals NH Transportation Program distributes a language survey to its employees. The objective of the survey is to evaluate the needs of Easterseals NH Transportation Program customers who are not able to communicate in English. The first question asked, In What Way(s) Do You Interact with Easterseals NH Transportation Program Riders? The chart below will illustrate the results.

<b>Method of Interaction</b>	<b>Percent of Responses</b>
Telephone	67%
Face to Face	33%
Email	
Fax	

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

<b>Frequency of Interaction</b>	<b>Percent of Responses</b>
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.

<b>Language</b>	<b>Percent of Interactions</b>
Spanish	5%

The survey asked, overall, how effectively employees are communicating with Easterseals NH Transportation Program passengers with LEP. The results are summarized below.

<b>Effectiveness</b>	<b>Percent of Total Responses</b>
Very Effective	25%
Moderately Effective	25%
Less Effective	50%
Unable to Communicate	

### **Community Partners**

Easterseals NH Transportation Program also canvases its community partners to assess the extent to which they come into contact with persons with LEP. Community partners are 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?

<b>QUESTION</b>	<b>MTA</b>	<b>RNMOW</b>	<b>Catholic Charities (CareGivers)</b>	<b>Gr. Salem CareGivers</b>	<b>Manchester Cmty Health Ctr</b>	<b>St. Joseph Cmty Services</b>
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 People with LEP**

In addition to the U.S. Census data, employee survey, and outreach to community partners, Easterseals NH Transportation Program conducts a survey of its riders. A copy of the survey is attached in Appendix A.

### **Factor 3 – The Importance of Easterseals NH Transportation Program Service to People’s Lives**

Access to the services provided by Easterseals NH Transportation Program is critical to many in the service area. Many depend on Easterseals NH Transportation Program 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 to many of the region’s residents, it is essential that language not be a barrier.

#### **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.**

### **Factor 4 – Resources and Costs for LEP Outreach**

Easterseals NH Transportation Program has committed resources to improving access to its services and programs for people with LEP.

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

- ◆ Translation services available with Ascendria Care Alliance Language Bank (all languages)
- ◆ Bilingual English/Spanish customer service representatives
- ◆ Bilingual English/Spanish trainers for Easterseals NH Transportation Program drivers

- ◆ Bilingual English/Spanish drivers
- ◆ TTY – Dial 711, or call 800-735-7569 (English), or 866-479-7569 (Spanish)

To date, the costs associated with these efforts are included in Easterseals NH Transportation Program budget.

## **Outcomes**

### **Tools for alerting riders of language assistance**

Following the “Four Factor Analysis,” Easterseals NH Transportation Program concluded that, while resources are currently available in Spanish, the most commonly spoken language after English, there are many other languages spoken in the service area. To ensure everyone with LEP can access our transportation services and fully engage in their community, Easterseals also ensures:

1. Translation services for telephone communications with customer service representatives;
2. TTY – Dial 711, or call 800-735-7569 (English), or 866-479-7569 (Spanish)
3. Staff charged with improving community engagement through coordinated outreach with the Greater Manchester Regional Coordination Council.

The above tools are available for the benefit of all people with LEP in our service area. Easter Seals transportation staff is fully engaged with the Greater Manchester Regional Transportation Council.

## **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 people with LEP;
- ◆ Update the policy to include survey information and thereafter every three years;
- ◆ Ongoing collaboration with regional partners and the Greater Manchester Regional Coordination Council;
- ◆ Ongoing review of any requests received at Easterseals NH Transportation Program website; and
- ◆ Post Event Assessments

## **Post-Event Assessments**

Following service changes and planning projects, Easterseals NH 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**

Easterseals NH Transportation Program conducts ongoing and new employee training on how to use LEP translation and interpretation services available to the public. The training program's learning objectives include:

- Employee awareness training for how to engage with people with LEP.
- Overview of Civil Rights regulations and agency requirements as a FTA Section 5310 recipient; and
- Review of Easter Seals Transportation Program Title VI policy.

## **Translation of Vital Documents**

Easterseals NH Transportation Program will provide translation of documents or provide interpretation services for consumers with LEP as needed. The list of documents that will be translated includes:

- ◆ Civil Rights Complaint Form
- ◆ Transportation Information Brochure



**Providing Assistance to and Monitoring Subrecipients**

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

**Title VI Equity Analysis for Facility Acquisition**

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

**FIXED ROUTE TRANSIT PROVIDERS SERVICE STANDARDS AND POLICIES**

Easterseals New Hampshire Inc. :

is a fixed route transit provider

is **not** a fixed route transit provider

## Title VI Notice - Spanish

### Política de tránsito del Título VI

El **PROGRAMA DE TRANSPORTE DE EASTERSEALS NEW HAMPSHIRE** asegura que ninguna persona, por motivos de raza, color u origen nacional, será excluida de participar en o se le negarán los beneficios o estará sujeta a discriminación en relación con la provisión de servicios de transporte público proporcionados por el **PROGRAMA DE TRANSPORTE DE EASTERSEALS NEW HAMPSHIRE**.

Cualquier persona que desee información adicional sobre la obligación de no discriminación del **PROGRAMA DE TRANSPORTE DE EASTERSEALS NEW HAMPSHIRE** o crea que él o ella, individualmente o como miembro de una clase específica de personas, ha sido objeto de discriminación por motivos de raza, color u origen nacional. puede presentar una queja ante el **PROGRAMA DE TRANSPORTE DE EASTERSEALS NEW HAMPSHIRE** dentro de los 180 días posteriores a la fecha de la supuesta discriminación.

Para presentar una queja, comuníquese con **el PROGRAMA DE TRANSPORTE DE EASTERSEALS NEW HAMPSHIRE** al 603-668-8603, <https://www.easterseals.com/nh/our-programs/transportation/> o envíe una carta a 180 Zachary Rd, Manchester NH 03109.

## Title VI Complaint Form - Spanish

### Formulario de quejas del programa de transporte de Easter Seals New Hampshire

Es política del Programa de Transporte de Easter Seals New Hampshire defender y garantizar el pleno cumplimiento del Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de los Derechos Civiles de 1987 y todos los estatutos relacionados. El Título VI y los estatutos relacionados prohíben la discriminación en los programas con asistencia federal y exigen que ninguna persona en los Estados Unidos de América, por motivos de raza, color u origen nacional, sea excluida de la participación, se le nieguen los beneficios o sea de otro modo sujeto a discriminación bajo cualquier programa o actividad que reciba asistencia federal.

Cualquier individuo, grupo de individuos o entidad que crea que ha sido objeto de discriminación prohibida por el Título VI y los estatutos relacionados al recibir los servicios de transporte de Easter Seals New Hampshire puede presentar una queja por escrito a la siguiente dirección:

Lisa Ludwigsen, Coordinadora del Título VI Programa de Transporte de Easter Seals New Hampshire  
180 Zachary Rd  
Mánchester, NH 03109  
Teléfono: (603) 668-8603  
Fax: (603) 624-9794

Se puede encontrar más información sobre los requisitos de derechos civiles relacionados con el tránsito en el sitio web de la FTA en [www.fta.dot.gov](http://www.fta.dot.gov).

**Nota:** Además del formulario, *en páginas separadas*, describa su queja. Debe incluir detalles específicos como nombres, fechas, horas, números de ruta, testigos y cualquier otra información que nos ayude en nuestra investigación de sus alegaciones. Proporcione también cualquier otra documentación que sea relevante para esta queja.

**Importante:** Firme en la última página del formulario después de imprimirlo.

**Sección I**

**Creo que he sido (o alguien más ha sido) discriminado en base a de:**

- Raza / Color / Origen Nacional
  - Discapacidad
  - No Aplica
  - Otro (especificar): \_\_\_\_\_
- 

**Creo que el Programa de Transporte de Easter Seals no ha cumplido con los siguientes requisitos del programa:**

- Título vi de la Ley de Derechos Civiles de 1964 (Título VI)
- Ley de Estadounidenses con Discapacidades (ADA)
- Empresa comercial en desventaja (DBE)
- Externa Igualdad de Oportunidades de Empleo
- No Aplica
- Otro (especificar): \_\_\_\_\_

***Sección II***

Nombre: \_\_\_\_\_

Dirección: \_\_\_\_\_

Ciudad (\*): Estado (\*): Código postal: \_\_\_\_\_

Números telefónicos:

Hogar: \_\_\_\_\_

Celúla: \_\_\_\_\_

Dirección de correo electrónico: \_\_\_\_\_

---

Requisitos de formato accesible:

- Letra grande
  - No Aplica
  - Otro (especificar): \_\_\_\_\_
- 

***Sección III***

¿Está presentando esta queja en su propio nombre?  Sí  No

De lo contrario, proporcione el nombre y la relación de la persona por la que presenta esta queja:

Explique por qué ha solicitado a un tercero:

Confirme que ha obtenido el permiso de la parte agraviada si presenta la presentación en nombre de un tercero:  Sí  No

Por favor firme aquí: \_\_\_\_\_ Fecha: \_\_\_\_\_