

VNA at HCS

Transportation Program

Title VI Plan

January 2014

Updated May 2020

Table of Contents

I. Introduction	1
VNA at HCS's Commitment to Civil Rights	1
II. General Requirements.....	2
Notice to the Public	2
Discrimination Complaint Procedures.....	2
Complaint Procedure	4
Active Lawsuits, Complaints or Inquiries Alleging Discrimination	5
III. VNA at HCS's Public Participation Plan	6
Key Principles.....	6
Limited English Proficient (LEP) Goals of the Public Participation Plan (PPP).....	7
Objectives of the Public Participation Plan	7
IV. VNA at HCS's Public Participation Process.....	8
Outreach Efforts – Alerting Riders and Encouraging Engagement.....	8
Selection of Meeting Locations.....	9
VNA at HCS Mediums	9
Addressing Comments	10
The Incorporation of Public Comments into Decisions.....	10
Identification of Stakeholders	10
Our Community Partners.....	10
Stakeholder List.....	10
V. Decision Making Bodies	10
Passenger Advisory Committee (PAC)	11
VI. Service Standards and Policies.....	11
Vehicle Load.....	12
Vehicle Headway (Frequency)	13
On-Time Performance.....	13
Service Availability – Access to the Bus.....	13
Vehicle Assignment Policy	13
Transit Amenity Policy	14

Monitoring Service Standards	14
VII. Summary of Changes.....	14
Service Change Evaluations Since 2008	14
Program Specific Requirements	14
Title VI Monitoring	15
Demographic Service Profile.....	15
VIII. Grants, Reviews and Certifications.....	15
Pending Applications for Financial Assistance-	15
Civil Rights Compliance Reviews in the Past 3 Years	15
Recent Annual Certifications and Assurances	15
Contact.....	15
IX. Language Assistance Plan.....	15
Improving Access for People with Limited English Proficiency (LEP).....	15
Factor 1	16
Service Area Overview	16
Factor 2	17
Factor 3	20
Factor 4	21
Oversight	21
Monitoring, Evaluating and Updating the Language Assistance Plan and Public	21
Participation Process.....	21

I. INTRODUCTION

VNA AT HCS'S COMMITMENT TO CIVIL RIGHTS

This update of VNA at HCS Transit's Title VI Program has been prepared to ensure that the level and quality of VNA at HCS's fixed route/demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to VNA at HCS's riders and other community members. Additionally, through this program, VNA at HCS 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 VNA at HCS 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 VNA at HCS'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).

"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), VNA at HCS 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 VNA at HCS'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 VNA at HCS riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, VNA at HCS has presented the following information on its bus schedules, posters, riders guides, website, buses and transit office.

Your Civil Rights

HCS Transportation Programs (VNA at HCS) 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 they have been aggrieved by any unlawful discriminatory practice under Title IV may file a complaint with VNA at HCS. For more information on VNA at HCS's civil rights program and the procedures to file a complaint, please contact 352-2253; or email jmack@hcsservices.org or visit our administrative office at 312 Marlboro Street from 8:00am to 4:30pm. A complaint may be filed 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. For more information about VNA at HCS programs and services, visit www.hcsservices.org. If information is needed in another language, please contact 352-2253.

Discrimination Complaint Procedures

VNA at HCS 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 age, race, color, sex, religion, disability or national origin by VNA at HCS 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 www.hcsservices.org.

VNA AT HCS TITLE VI COMPLAINT FORM

IF YOU BELIEVE YOU HAVE RECEIVED DISCRIMINATORY TREATMENT BY THE VNA AT HCS ON THE BASIS OF RACE, COLOR OR NATIONAL ORIGIN YOU HAVE THE RIGHT TO FILE A COMPLAINT WITH THE VNA AT HCS.

Name: _____

Address: _____

Telephone Numbers: (home) _____ (work) _____

E-Mail Address: _____

Accessible Format Requirements?

Large Print ____ Audio Tape ____ TDD ____ Other _____

The Federal Transit Administration (FTA) Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington DC 20590 .is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, “Federal Actions To Address Environmental Justice in Minority Populations and Low -income Populations,” and the Department of Transportation’s Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.

In VNA at HCS’s complaint investigation process, we analyze the complainant’s allegations for possible Title VI and related deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider and assistance is offered to correct the inadequacies within a predetermined timeframe. The State of New Hampshire may also refer the matter to the U.S. Department of Justice for enforcement.

Section II

Are you filing this complaint on your own behalf? Yes ____ No ____ (If you answered ‘yes’ to this question, go to section III)

If the answer was ‘no’ please supply the name of the person for whom you are complaining:

Please explain why you have filed for a third party.

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

Section III

Have you previously filed a Title VI complaint with VNA at HCS or the FTA? Yes ___ No ___

If yes, what was your FTA Complaint Number? _____

(Note: This information is needed for administration purposes; we will assign the same complaint number to the new complaint.)

Have you ever filed with any of the following agencies?

Transit Provider _____ NHDOT _____ Department of Justice _____ Equal Employment Opportunity Commission _____ Other _____

Have you filed a lawsuit regarding this complaint? Yes ___ No ___

If yes, please provide a copy of the complaint form.

(Note: The above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we will defer to the decision of the court.)

Section IV

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route number, 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.

Section V

May we release a copy of your complaint to the New Hampshire Department of Transportation (NHDOT)? Yes _____ No _____

May we release your identity to the NHDOT? Yes ___ No ___

(Note: We cannot accept your complaint without a signature)

Signature _____ Date _____

Complaint

If you believe that you have received discriminatory treatment by the VNA at HCS based on race, color or national origin, you have the right to file a complaint with the VNA at HCS Corporate Compliance Officer.

Methods of filing a complaint:

Complete the Complaint Form, and send it to:

**Corporate Compliance Officer
VNA at HCS
312 Marlboro Street
Keene, NH 03431**

Verbal complaints are accepted and transcribed by the Corporate Compliance Officer. To make a verbal complaint, call 603-352-2253 and ask for the Corporate Compliance Officer.

VNA at HCS investigates complaints received no more than 180 days after the alleged incident. VNA at HCS will process complaints that are complete. Once the complaint is received, VNA at HCS will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by VNA at HCS. The VNA at HCS will notify the NH Department of Transportation (DOT) within five (5) business days upon receiving a formal complaint.

VNA at HCS has up to ten days to investigate the complaint. If more information is needed to resolve the case, the **VNA at HCS** 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 VNA at HCS's investigator is not contacted by the complainant or does not receive the additional information within thirty days, VNA at HCS 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

VNA at HCS maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming VNA at HCS that allege discrimination based on 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 VNA at HCS in response, or final findings related to the investigation, lawsuit, or complaint. As of the writing of this program (2019), there are zero complaints pending which allege discrimination on the grounds of race, color or 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. VNA AT HCS'S PUBLIC PARTICIPATION PLAN

Key Principles

VNA at HCS's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in VNA at HCS'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 VNA at HCS's decision making.
- The concerns of all participants involved will be considered in the decision-making process; and,
- VNA at HCS will seek out and facilitate the involvement of those potentially affected.
- No person will be precluded from participating in VNA at HCS's service planning and development process based on race, color, sex or national origin.

Through an open public process, VNA at HCS has developed a public participation plan to encourage and guide public involvement efforts and enhance access to VNA at HCS'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 VNA at HCS 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 (PPP)

The overarching goals of VNA at HCS'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 - VNA at HCS 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 - VNA at HCS develops and maintains partnerships with communities through the methods described in its public participation plan.
- Quality Input and Participation - Comments received by VNA at HCS are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

Objectives of the Public Participation Plan

VNA at HCS'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 - VNA at HCS will proactively reach out to and engage low income, minority and LEP populations from the VNA at HCS 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 – VNA at HCS 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.

VNA at HCS will use its public participation plan when considering all fare changes, major modifications to routes and schedules, and other transit planning projects when:

- A fare increase/decrease or significant change in the method of fare payment is being considered;
- Advance reservation policy is reduced or increased;
- A new route is established;
- An existing route is proposed for elimination;
- Considering the total discontinuance of service on any line or group of routes on any given day when service is currently offered;
- Any system-wide change in service hours;
- Routing on any given route or group of routes that affects more than 25% of the riders using the affected route(s); or
- Schedules are changed on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.
- For minor schedule and service changes not rising to the level of those above, VNA at HCS will post service change notices on appropriate buses and stops thirty days in advance of the change date.

IV. VNA AT HCS'S PUBLIC PARTICIPATION PROCESS

Outreach Efforts – Alerting Riders and Encouraging Engagement

VNA at HCS's PPP includes new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While VNA at HCS maintains these elements to its outreach program along with traditional seat-drop flyers, VNA at HCS has availed itself of the new communication methods also 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 fare or service change as an example.

1. A service/fare change proposal is developed internally or as a result of public comment;
2. Proposals are reviewed by VNA at HCS's Passenger Advisory Committee (PAC);
3. A Title VI review of the proposal is conducted;

4. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the VNA at HCS transportation program service area;
5. Public outreach materials and programs are developed in alternative formats on request.
6. Outreach in advance of public information sessions is released using the toolbox of mediums listed below;
 1. An email is transmitted to VNA at HCS community partners;
 2. Local radio stations of the Monadnock Radio Group will be used to air PSA's; interviews may also be conducted.
 3. The public comment period ends;
 4. The VNA at HCS Board of Directors is informed of the change and the public participation process at their regularly scheduled meeting.
 5. The final service/fare change date is set;
 6. Outreach is conducted in advance of any service or fare change;
 7. Materials in all mediums, including print, posters, sign boards at stop locations, and website are updated in all formats.

Selection of Meeting Locations

When determining locations and schedules for public meetings, VNA at HCS will:

- 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, community television, or newspaper ads 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 comment.

VNA at HCS Mediums

- Print – Newspapers and other periodicals
- Advertising on-board buses (interior)
- Website – VNA at HCS has assembled a comprehensive website
- Social Media – VNA at HCS uses Facebook to help engage the community
- VNA at HCS has developed Bus lines, a monthly newsletter which now reaches riders of the services
- Radio – Public Service Announcements
- Seat Drops, On-board Flyers – VNA at HCS regularly uses seat drops and flyers to provide riders with details of service changes and schedules of public meetings and hearings.
- E-mail to Community Partners

- Public Information Sessions
- Public Hearings
- Legal Notices

Addressing Comments

The Incorporation of Public Comments into Decisions

All comments received through the public participation plan are given careful, thoughtful consideration. Because there are a number of different ways riders or members of the community can comment on proposed service or fare changes (mail, email, social media, public meetings and others), all comments are assembled into a single document for presentation to the Passenger Advisory Committee.

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 and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, VNA at HCS has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of VNA at HCS's community stakeholders can be obtained by contacting VNA at HCS.

Stakeholder List

Any community organization or person can be added to the VNA at HCS stakeholder list and receive regular communications regarding service changes by contacting the VNA at HCS administrative office at 603-352-2253. Local organizations and businesses can also request that a speaker from VNA at HCS attend their regular meeting at the same number or through the VNA at HCS website at info@hcsservices.org.

V. Decision Making Bodies

At VNA at HCS, decisions regarding policy, capital programming and facility locations are made by Board of Directors. VNA at HCS's Board of Directors is composed of fifteen members representing southwestern New Hampshire. Board members are recruited to broadly reflect the service area and to engage those who have expertise in the various service lines that the agency provides. The HCS annual meeting of the Board is open to the public and is advertised as such in the print and social media.

Passenger Advisory Committee (PAC)

The Passenger Advisory Committee (PAC) holds ongoing meetings to help to guide decisions regarding routes, schedules, and other topics important to the community and our riders. Meetings of the Passenger Advisory Committee are open to the public, and are held at Home Healthcare, Hospice and Community Services, 312 Marlboro Street in Keene. Meetings are announced using a variety of mediums outlined above.

The Passenger Advisory Committee (PAC) is comprised of passengers representing various services and routes offered by the system. At meetings, members discuss all aspects of the VNA at HCS's services from the perspective of the consumer/public. This group's contribution is an invaluable service to the VNA at HCS. Membership in the PAC is voluntary and open ended.

Monadnock Region Coordinating Council for Community Transportation (MRCC)

The Monadnock Region Coordinating Council for Community Transportation serves to establish a framework for community transportation coordination in the region and raises awareness of local and rural transportation needs. This group is guided by a vision to create a sustainable community transportation network that provides all community members, specifically those most in need of transportation, access to services and opportunities. Membership includes not for profit and for profit stakeholders. Membership in all decision-making bodies will not be denied due to race, color or national origin.

	Caucasian	African American	Hispanic	Asian	Race 4	Race 5
Board of Directors	15	0	0	0		
Passenger Advisory Committee	7	0	0	0		
Monadnock Region Coordinating Council for Community Transportation	14	0	0	0		

VI. SERVICE STANDARDS AND POLICIES

VNA at HCS has developed a set of quantifiable service standards and policies. These service standards are updated through a public participation process and approved by VNA at HCS's Board of Directors. There will be input from the VNA at HCS's Passenger Advisory Committee (PAC). All passengers are encouraged to participate as members of VNA at HCS's Passenger Advisory

Committee. All passengers are notified through agency newsletters, postings inside of agency vehicles, and through recruitment by agency drivers and office staff, of the opportunity to participate as members of PAC.

These service standards and policies include:

- ◆ Vehicle Load
- ◆ Headways (Frequencies)
- ◆ On-time Performance (Schedule Adherence)
- ◆ Service Availability
- ◆ Vehicle Assignment Policy
- ◆ Transit Amenity Policy

Following the internal updating of these policies and standards, VNA at HCS will advertise and hold a public information session to receive comments on the proposed standards. During the session, VNA at HCS staff will present an overview of the components of VNA at HCS’s public participation process as well as the various policies and standards. A copy of the presentation will be available by contacting VNA at HCS.

Vehicle Load

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle.

Vehicle Type	Seated Capacity	Standing Capacity	Total Capacity	Preferred	Average Load	Maximum Load
Ford Van/cutaway	19	4	23	1	.5	1.2
Ford Van/cutaway	19	4	23	1	.5	1.2
Ford Van/cutaway	19	4	23	1	.5	1.2
Ford Van/cutaway	19	4	23	1	.5	1.2
Ford Van/cutaway	19	4	23	1	.5	1.2
Ford Van/cutaway	19	4	23	1	.5	1.2
Sprinter	12	3	15	1	.5	1.2
Sprinter	12	3	15	1	.5	1.2

Vehicle Headway (Frequency)

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. Routes are schedule in minute frequencies. **VNA at HCS** will also consider more frequent (20-min.) service where ridership levels warrant, and funding levels permit and less frequent services where demand dictates.

Service/Mins	Weekday					
VNA at HCS City Express Local Service	63 min.	.				
VNA at HCS City Express Campus/Comm unity Shuttle Local Service	30 Min.					

On-Time Performance

Among the most important service standard for riders is on-time performance or adherence to published schedules.

- A vehicle is considered on time if it departs a scheduled time point no more than two minutes early and no more than 5 minutes late.
- VNA at HCS’s on-time performance objective is 90% or greater.

Service Availability - Access to the Bus

VNA at HCS currently provides transit service so that 96% of all residents of Keene are within a three-quarter mile walk of bus service. Consideration is given to new markets as demand warrants and as resources become available.

Vehicle Assignment Policy

With several practical considerations, VNA at HCS assigns buses to service so that average age of the buses serving each route does not exceed the average age of the fleet. Bus assignments take into

account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route.

Transit Amenity Policy

VNA at HCS has 31 regular stops in the service area. Stops, shelters and benches will be placed according to industry standards (TCRP Report 19) with consideration of and permitting for local and special needs. The installation of new bus amenities can be requested through the transportation office, or at public meetings.

When the annual cost of repairs to any amenity (beyond the cost of normal cleaning) is greater than the cost of the structure, VNA at HCS reserves the right to permanently remove the amenity.

Monitoring Service Standards

For the on-going monitoring and measurement of service standards and policies, VNA at HCS uses the following schedule and methods.

Service Standard/Policy	Sample Schedule	Methodology
Vehicle Load	All Routes annually	Survey samples and/or sample of dispatch logs
Vehicle Headway	Assessed Annually as Part of Service Planning	Survey samples and/or sample of dispatch logs
On-time Performance	Assessed monthly	Survey samples and/or sample of dispatch logs
Service Accessibility	Assessed annually as part of Service Planning	Survey samples and/or sample of dispatch logs
Vehicle Assignment Policy	Assessed annually	Survey samples and/or sample of dispatch logs

VII. SUMMARY OF CHANGES

Service Change Evaluations Since 2019

Since the VNA at HCS’s 2019 plan the route has had no changes. Public notices and a hearing will be held in accordance with any changes to this plan going forward.

Program Specific Requirements

Title VI Monitoring

The results of the ongoing monitoring of service standards as defined in the VNA at HCS's 2019 program can be obtained by contacting VNA at HCS.

Demographic Service Profile

Because VNA at HCS operates fewer than 50 buses in peak service, a demographic service profile was not prepared for this plan update.

VIII. GRANTS, REVIEWS AND CERTIFICATIONS

Pending Applications for Financial Assistance-

The City Express is applying for funding from the City of Keene. This is an annual request for local matching funds.

Civil Rights Compliance Reviews in the Past 3 Years

VNA at HCS has not been the subject of any such reviews since the last submission.

Recent Annual Certifications and Assurances

VNA at HCS executed its most recent Certifications and Assurances to the FTA in March 2020.

Contact

For additional information on the VNA at HCS 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:

Transportation Manager
Home Healthcare, Hospice and Community Services
312 Marlboro Street, Keene, NH 03431
603-352-2253
TTY use 711

IX. LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency (LEP)

In order to ensure meaningful access to programs and activities, VNA at HCS uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps VNA at HCS 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 the Transportation Program at the VNA at HCS.
2. The frequency with which LEP persons meet the Transportation Program at the VNA at HCS.
3. The nature and importance of the Transportation Programs at the VNA at HCS's in people's lives; and
4. The resources available to the Transportation Program at the VNA at HCS 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 VNA at HCS'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, VNA at HCS 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 the transportation staff at the VNA at HCS.

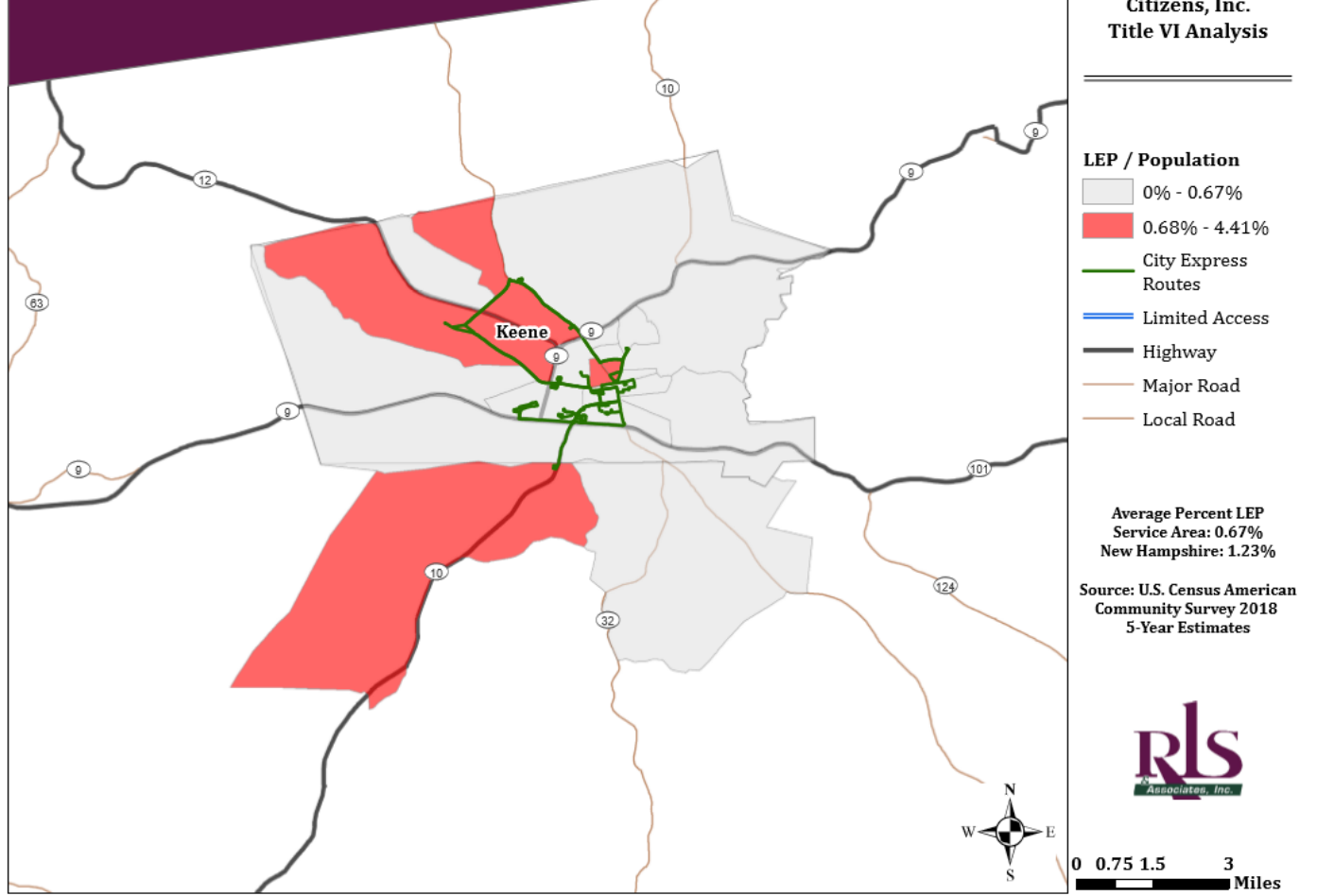
Service Area Overview

The Transportation Program at the VNA at HCS's service area encompasses a fixed route in the City of Keene. The estimated population of the City of Keene is 22,236; 4.7 % 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 0.3 % to 2.1 % of the total service area population.

Speak English "less than very well"	Population in language group	Percent of total population
Spanish or Spanish Creole	141	0.6%
Asian	379	1.7%
Other	59	0.3%
Other Indo-European languages	466	2.1%

The map in Exhibit A illustrates the distribution of population densities by Census block group where individuals speak English "Less than Very Well."

Significant Limited English Proficiency (LEP) Census Block Groups



Factor 2 – Frequency of LEP Use

Since only 4.7% of the population in the VNA at HCS’s service area speak English “less than very well,” and no individual language group is above 2.1% of the population there are limited opportunities where VNA at HCS comes into contact with the LEP population. Should LEP populations increase, the VNA at HCS will develop a Language Access Plan, and assess major points of contact including:

- The use of the bus service (on-board signage, announcements and driver language skills);
- Communication with VNA at HCS's customer service staff;
- Bus pass sales;
- Printed outreach materials;
- Web-based outreach materials; including the Google Maps app:
- Public meetings;
- Demand response reservation agents;
- Local news media (print and radio);and
- Service-related posters at VNA at HCS's office.

VNA at HCS distributed a language survey to its employees. The objective of the survey was to evaluate the needs of VNA at HCS customers who are not able to communicate in English. The first question asked, In What Way(s) Do You Interact with **VNA at HCS** riders? The chart below illustrates the results:

Method of Interaction	Percent of Responses
Telephone	25%
Face to Face	75%
Email	0%
Fax	0%

Next, the survey asked how often employees meet LEP customers. The chart below outlines the results.

Frequency of Interaction	Percent of Responses
Often	0%
Sometimes	0%
Rarely	5%
Never	95%

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

Language	Percent of Interactions
Asian	1%
Spanish	1%
Other	0%

The survey asked, overall, how effective employees are in communicating with Limited English Proficient VNA at HCS passengers. The results are summarized below.

Effectiveness	Percent of Total Responses
Very Effective	85%
Moderately Effective	15%

Less Effective	
Unable to Communicate	

Community Partners

VNA at HCS also canvassed its community partners to assess the extent to which they met LEP populations. Community partners 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?

<u>Question</u>	<u>Partner Name</u> <u>Healthy Starts at</u> <u>HCS</u>	<u>Community</u> <u>Volunteer</u> <u>Transportation</u> <u>Company</u>	<u>Keene Housing</u>
Do you encounter non-English speaking/reading people who need your services?	Yes	N	Yes
If so, what are the top three languages that you encounter?	Spanish	none	Spanish, Vietnamese, deaf
How do you address language barriers?	Contracted Interpreter	CVTC has a Language Assistance Plan	DT interpreter service; Language Assistance Plan
Do you find language to be a barrier in preventing you from providing service?	No	No	No

Consulting Directly with the LEP Population

In addition to the U.S. Census data, employee survey, and outreach to community partners, VNA at HCS implemented a survey of its riders. A copy of the survey is attached in Appendix A.

1. Is English your native language?
97% Yes 3% No
2. What are your top three choices to get information about transportation services?
Drivers 40%

Posters	35%
Bus Lines newsletter	13%
3. Do you consider yourself:	
White	77%
Multiple Race	10%
Asian	4%
Hispanic	3%
Other	3%

Factor 3 – The Importance of VNA at HCS Service to People’s Lives

Access to the services provided by VNA at HCS is critical to the lives of many in the service area. Many depend on VNA at HCS’s services for access to jobs and for access to essential community services like schools, shopping and medical appointments. Riders eligible for service under the American’s with Disabilities Act (ADA) require service for the same reasons. 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.

A ridership survey conducted in April 2020 showed the following trip purposes. Based on current stop logs, these trip purposes have remained steady.

Appointments	27%
Work	10%
Other	4% (example: exercise, pay bills school, social service agency etc.)
Medical appointments	27%
Shopping	29% (including groceries)
Entertainment	3% (example: Senior Center)

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, education or employment. Critical information from VNA at HCS which can affect access includes:

- Route and schedule information
- Fare and payment information
- Information regarding making the best use of the system (How To)
- Service announcements
- Safety and security announcements
- Complaint and comment forms
- Outreach related to opportunity for public comments
- Information about demand response services under the ADA and other special programs
- What to do in an emergency (where to look for service change announcements)

The following notice is posted on all VNA at HCS vehicles.

The VNA at HCS 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 VNA at HCS.

Any person who wants additional information on VNA at HCS'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 VNA at HCS within 180 days of the date of the alleged discrimination.

To file a complaint contact VNA at HCS at (603) 352-2253, or info@HCSservices.org or send a letter to Transportation Manager, VNA at HCS, 312 Marlboro Street, Keene, NH 03431. *A complaint may be filed 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

Following the “Four Factor Analysis”, VNA at HCS concluded that no additional assistance is required at this time.

The VNA at HCS will commit resources for LEP if the need arises. According to census information, 4.7% of the population in the transit service area has limited English speaking proficiency. The VNA at HCS is tracking this information and will devote resources should it be shown to be necessary.

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 every three years.
- ◆ Ongoing collaboration with community partners;
- ◆ Post Event Assessments (PEA)

Post-Event Assessments

Following service changes, fare increases and planning projects, Transportation Staff at the VNA at HCS assesses 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

VNA at HCS conducts annual and new employee training. The annual in-service training is comprised of a review of Drug & Alcohol Policies, blood borne pathogens, Title VI review and other safety related policies and procedures.

New transportation staffs receive a day long orientation on policies and procedures and are issued a driver's manual for reference. Safety and emergency plans are reviewed as well as the Title VI program and complaint procedure. Several videos are reviewed pertaining to all aspects of the transportation department as well; driver functions, vehicle functions, wheelchair lift operations, wheelchair securement protocol, and assisting elderly and disabled communities. New staff will then train with a driver on the services that they will be performing for the agency.

Currently, LEP translation services are not part of the training, since LEP is less than 1.2% of the population of the VNA at HCS transportation service area. LEP is evaluated according to the procedures indicated in this plan and all transportation staff will be trained on translation services as the need arises and is shown to be necessary.

Translation of Vital Documents

VNA at HCS will provide the following documents on an as needed basis upon request in the language best meeting the need of the passenger.

- Civil Rights Complaint Form
- ADA Eligibility Applications
- Service Change Announcements
- On-board notices
- Maps, Schedules, rider information and ADA service information
- Service complaint forms