

***Federal Transit Administration
Title VI Program***

**Community Action Program Belknap
Merrimack Counties Transportation Services**

September 14, 2023 of Plan Approval

(Plan expires 3 years from date approved by the board)

Title VI Plan Table of Contents

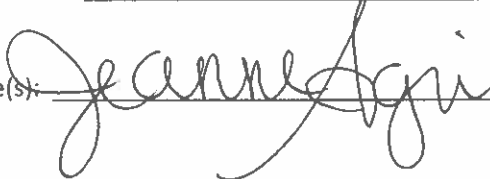
The CAPBM Transportation Services Title VI plan includes the following elements:

1. Plan Approval, Annual Certifications and Assurances, Revision Log
2. Policy Statement
3. Notice to the Public
4. Complaint Procedure
5. Complaint Form
6. List of transit related Title VI Investigations, Complaints and Lawsuits
7. Public Participation Plan
8. Language Assistance Plan
9. Minority Representation Table and Description
10. Providing Assistance to and Monitoring Subrecipients
11. Title VI Equity Analysis for Facility Acquisition
12. Fixed Route Transit Provider Requirements

Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan
Adopted on: September 14, 2023

Adopted by: CAPBM Board of Directors

Signature(s): 

Approval: Page 1 of 2

**Board of Directors In-Person Meeting Minutes
Thursday, September 14, 2023 @ 5:30 pm**

Meeting called to order at: 5:30

Board Attendance

Present: David Croft, Bruce Carri, Safiya Wazir, Dennis Martino, David Siff, Tracy Vergason,

Excused: Heather Brown, Chris Pyles, Sara A. Lewko, Ashley Reed

Staff Present: Jeanne Agri, CEO; Michael Tabory, COO; Steve Gregoire, Budget Analyst; Terri Paige, Transportation Director; Heather Patton, Child Development Director; Kathy Howard, Executive Secretary

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• **Action Item: Approval of the Title VI plan for transportation - Terri Paige –**
Transportation Director

- Terri Paige introduced herself and informed the board that the Federal Transit Administration (FTA) requires the Title VI Plan to be updated and reviewed every 3 years.
- Terri proceeded to review the updates and answered board questions.
- She stated that the Transportation Department hopes to launch a new route from Concord to Franklin to Laconia and back.
- Terri also stated that for the first time since 2017, CAT broke the 100,000-ride mark.
- After a brief discussion, the following motion was made

A motion was made by David Siff to approve the Title VI Plan for Transportation as presented. Seconded by Safiya Wazir. All in favor. Motion carries.

Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

CAPBM Transportation Services will remain in compliance with this requirement by annual submission of certifications and assurances as required by NHDOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: Month, day, year

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
2016-2017	All	Plan was established or updated
September- December 2020	All	Updated the plan where needed
June-August 2023	All	Updated the plan where needed. Consolidated separate CAT and RTS\VDP plans into one plan for CAPBM Transportation Services

Section 2: Title VI Policy Statement

Policy Statement

The CAPBM Transportation Services, operating as a fixed route and demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the New Hampshire Department of Transportation (NHDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and NHDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. The CAPBM Transportation Services operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Notice to the Public

Title VI Notice to the Public

The CAPBM Transportation Services' Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

CAPBM Transportation Services

- The CAPBM Transportation Services operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the CAPBM Transportation Services.
- For more information on the CAPBM Transportation Services' civil rights program, the procedures to file a complaint, or to file a complaint, please contact Cindy Yanski at 603-225-1989 ext. 1210, (TTY 800-735-2964); email cyanski@capbm.org; or visit our administrative office at 2 Industrial Park Dr., Concord, NH 03301. For more information, visit www.concordareatransit.com
- For transportation-related Title VI matters, a complaint may also be filed directly with the:

New Hampshire Department of Transportation, Attn: Shannon Aiton, Title VI Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; TTY: 800-735-2964; titlevi@dot.nh.gov

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- If information is needed in another language, contact Cindy Yanski at 603-225-1989 ext. 1210, (TTY 800-735-2964); email cyanski@capbm.org.

The CAPBM Transportation Services Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. Printed brochures
2. Agency and Service websites
3. Covered bus stops

Section 4: Title VI Complaint Procedure

The CAPBM Transportation Services' Title VI Complaint Procedure is made available in the following locations:

- Agency and service websites: concordareatransit.com and capbm.org
 - Hard copy in the central office
 - Agency Title VI Plan
-

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by the CAPBM Transportation Services may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the CAPBM Transportation Services no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the CAPBM Transportation Services will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the New Hampshire Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The CAPBM Transportation Services has 45 days to investigate the complaint. If more information is needed to resolve the case, the CAPBM Transportation Services may contact the complainant requesting further information. The complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 business days, the CAPBM Transportation Services can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (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 it must direct the appeal to the agency initially. The complainant has 10 days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: New Hampshire Department of Transportation, Attn: Shannon Aiton, Title VI Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; TTY: 800-735-2964; titlevi@dot.nh.gov

Or

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact Cindy Yanski at 603-225-1989 ext. 1210, (TTY 800-735-2964); email cyanski@capbm.org.

Section 5: Title VI Complaint Form

The CAPBM Transportation Services' Title VI Complaint Procedure is made available in the following locations:

- Agency and services website: capbm.org and concordareatransit.com
- Hard copy in the central office
- Agency Title VI Plan

CAPBM Transportation Services Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
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 not, please supply the name and relationship 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:				

I believe the discrimination I experienced was based on (check all that apply):

Title VI: Race Color National Origin

Other (specify): _____

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV

Have you previously filed a Civil Rights related complaint with this agency?

Yes

No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes

No

If yes, check all that apply:

Federal Agency: _____

Federal Court _____

State Court _____

State Agency _____

Local Agency _____

If marked Yes in Section V, please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI

Name of agency complaint is against:
Contact person:
Title:
Telephone number:

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

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

**Community Action Program Belknap Merrimack Counties
Transportation Services Department
Cindy Yanski, Mobility Manager
PO Box 1016, Concord, NH 03302
603-225-1989 ext. 1210
cyanski@capbm.org**

Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

The CAPBM Transportation Services maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

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

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the CAPBM Transportation Services will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The public outreach and involvement activities conducted by the CAPBM Transportation Services over the last three years are too numerous to list. Our mobility manager and travel trainer regularly distribute and refill CAT bus schedules through Concord and MST brochures throughout the Region. They attend speaking and community events on a regular basis, talk with members of the community and community agencies, municipalities, senior living facilities, senior centers, with agencies working with low-income, seniors, transportation dependent, LEP populations and those new to the country. The mobility manager has been a guest on community tv and talk radio to promote the transportation services and programs throughout the region. We also engage through social media and our website, press releases. A sample of activities is listed below.

Specific Public Participation activities are listed in the table below:

Event Date	CAPBM Transportation Services Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
2/23/22	Cindy Yanski	Presentation	In person	Discussed transportation options with attendees and ways to get involved.
3/21/22	Cindy Yanski	Presentation	In person	Discussed transportation options and ways to get involved
6/14/22	Cindy Yanski	Presentation	In person	Discussed transportation options and ways to get involved

8/2/2023	Cindy Yanski	Presentation	Virtual	Discussed transportation options and ways to get involved
Ongoing	Website	Posted meeting information on MidStateRCC website	Information can be found at https://midstatercc.org on the home page, the Meeting Materials landing page and the Contact Us page	
Ongoing	Marketing materials	Meeting information\ invitation	Printed materials	Meeting information is listed on the MST brochure
Ongoing	Website	Posted meeting information on CAT website as a means to get more involved	https://concordareatransit.com/get-involved	

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the CAPBM Transportation Services is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (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. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The CAPBM Transportation Services' Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the CAPBM Transportation Services has conducted a *Four Factor Analysis* of the following areas: 1) Limited-English Proficient (LEP) Speaker Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, the CAPBM Transportation Services' will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program: Identifies and assesses the frequency CAPBM Transportation Services' staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus service;

- (b) Participation in public meetings;
- (c) Customer service interactions;
- (d) Ridership surveys;
- (e) Operator surveys.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Item #1 –Results of the Four Factor Analysis (including a description of the LEP population(s) served)

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

Of the 214,412 residents in the CAPBM Transportation Services service area, 3,133 residents describe themselves as speaking English less than “very well”. For the CAPBM Transportation Services service area, the latest U.S. Census Bureau data shows that among the area’s population 1.54% speak English “less than very well.” For these groups who speak English “less than very well”, .19% speak Spanish; .17% speak French, Haitian, or Cajun; .04% speak German or other West Germanic languages; .16% speak Russian, Polish, or other Slavic languages; .51% speak Other Indo-European languages; .01% speak Korean; .13% speak Chinese including Mandarin, Cantonese; .03% speak Vietnamese; .04% speak Tagalog including Filipino; .04% speak Other Asian and Pacific Island languages; .04 speak Arabic; .20% speak Other and unspecified languages.

	Combined Service Area	Combined Service Area
Label	Estimate	Percent of Population
Total:		
Speak only English	203,689	
Spanish:	2,219	1.09%
Speak English "very well"	1,828	0.90%
Speak English less than "very well"	391	0.19%
French, Haitian, or Cajun:	2,149	1.06%
Speak English "very well"	1,807	0.89%
Speak English less than "very well"	342	0.17%

German or other West Germanic languages:	488	0.24%
Speak English "very well"	411	0.20%
Speak English less than "very well"	77	0.04%
Russian, Polish, or other Slavic languages:	1,028	0.50%
Speak English "very well"	704	0.35%
Speak English less than "very well"	324	0.16%
Other Indo-European languages:	2,164	1.06%
Speak English "very well"	1,131	0.56%
Speak English less than "very well"	1,033	0.51%
Korean:	155	0.08%
Speak English "very well"	143	0.07%
Speak English less than "very well"	12	0.01%
Chinese (incl. Mandarin, Cantonese):	557	0.27%
Speak English "very well"	295	0.14%
Speak English less than "very well"	262	0.13%
Vietnamese:	141	0.07%
Speak English "very well"	90	0.04%
Speak English less than "very well"	51	0.03%
Tagalog (incl. Filipino):	460	0.23%
Speak English "very well"	374	0.18%
Speak English less than "very well"	86	0.04%
Other Asian and Pacific Island languages:	265	0.13%
Speak English "very well"	188	0.09%
Speak English less than "very well"	77	0.04%
Arabic:	345	0.17%
Speak English "very well"	267	0.13%
Speak English less than "very well"	78	0.04%
Other and unspecified languages:	752	0.37%
Speak English "very well"	352	0.17%
Speak English less than "very well"	400	0.20%

Factor 2: The frequency with which LEP persons come into contact with the program.

CAPBM Transportation Services surveyed its staff to determine the frequency with which staff and drivers have, or could have, contact with LEP persons. In addition, CAPBM Transportation Services also surveys its demand-response ridership annually and recently surveyed some of its Community Partners with specific questions regarding LEP populations. The results of these surveys and the Language Assistance Plan CAPBM LEP Analysis can be found at the end of this document as Exhibit A. CAPBM Transportation Services provides approximately 125,000 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the New Hampshire Department of Transportation, if needed, to ensure the individual receives access to the transit services.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

All of CAPBM Transportation Services' programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The CAPBM Transportation Services is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, the CAPBM Transportation Services will strive to provide alternative but meaningfully accessibility. Moreover, CAPBM Transportation Services continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in alternative languages(s) upon request.

Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.

CAPBM Transportation Services makes every effort to make its programs, services, and activities, accessible to LEP individuals. CAPBM Transportation Services will use available resources, both internal and external to accommodate reasonable requests for translations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

CAPBM Transportation Services has identified, developed, and uses the following:

- a) Individuals who have contact with the public are using the Android and iPhone application, Translator, and other translation applications to assist with translation services on the fly.
- b) CAPBM Transportation Services has developed partnerships with Ascentria Care Alliance, The Language Bank, and Rapport International translation services organizations, other local organizations working with the population, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- c) A list of web-based translation services can be provided by contacting the mobility manager.

Item # 3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of CAPBM Transportation Services' language assistance measures, CAPBM Transportation Services provides the following:

- Title VI Program including the Language Assistance Plan is made available upon request and hard copy in central office.
- Drivers and dispatchers are provided with guidance regarding our partnership with Ascentria, The Language Bank and Rapport International, and when requested, instruction for using the phone application, Translator.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

CAPBM Transportation Services will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the CAPBM Transportation Services service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether CAPBM Transportation Services' financial resources are sufficient to fund language assistance resources needed.
- Determine whether CAPBM Transportation Services has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning CAPBM Transportation Services' failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to CAPBM Transportation Services staff:

- Information on the CAPBM Transportation Services Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

CAPBM Transportation Services shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual.

Arrangements have been made with The Language Bank, Rapport International and Ascentria Care Alliance to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 603-225-1989.

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 9: Minority Representation Information

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

***Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

A. Minority Representation Table

Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
City of Concord TPAC – Public Transportation Subcommittee	4 – 100%					
Mid-State (Region 3) Regional Coordinating Council for Public Transportation	20-100%					

Note: insert the number of people and % of total board membership

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees, and councils, the CAPBM Transportation Services will make every effort to encourage minority participation on the boards. Detail any further efforts below.

CAPBM Transportation Services' mobility manager encourages community organizations of the opportunity to join or attend meetings as a guest of the Mid-State (Region 3) Regional Coordinating Council for Public Transportation whenever possible and appropriate.

Meeting date information, agendas and meeting minutes are posted on the Mid-State (Region 3) Regional Coordinating Council for Public Transportation's website at www.midstatercc.org and on social media platform(s).

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

CAPBM Transportation Services does not have subrecipients, but it does have two contracted agencies. The agency, CAPBM, does have subrecipients as the lead agency for Region 3, there are two funded recipients, CAPBM Transportation Services and Association of the Blind aka Future In Sight.

Yes. If yes, list the subrecipient names: Association of the Blind aka Future In Sight

CAPBM Transportation Services monitors subrecipients using the following process:

1. CAPBM Transportation Services uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: review trip reports from the agency to affirm each trip reimbursement originates within Region 3.
2. CAPBM Transportation Services collects Title VI programs from the subrecipients listed above and reviews programs for compliance by an onsite visit from the mobility manager once a year and potential check-ins more frequently, as needed.

Section 11: 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.)

Section 12: Fixed Route Transit Providers Service Standards and Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

CAPBM Transportation Services:

- is a fixed route transit provider
- is **not** a fixed route transit provider

All Fixed Route Transit Providers must submit:

- All requirements set out in Chapter III (General Requirements)
 - Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
 - Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

1) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
2) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
3) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey (ACS) data, at the Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
4) Analysis of disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N

CAPBM Transportation Services has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. CAPBM Transportation Services has prepared standards for its fixed route service.

a. Vehicle Load

Vehicle Type	Quantity	ADA Accessible	Wheelchair Capacity	Ramp or Lift	Seated Capacity	Standing Capacity	Total Capacity	Average Load Ratio	Maximum Load Ratio
Eldorado Passport 30' Low Floor	3	Yes	2	Ramp	27	0	27	1:1	1:1
Ford E450 Senior/Paratransit Cutaway	1	Yes	2	Lift	12	0	12	1:1	1:1
Ford E450 Senior/Paratransit Cutaway	1	Yes	3	Lift	12	0	12	1:1	1:1
Ford E450 Senior/Paratransit Cutaway	1	Yes	2	Lift	16	0	16	1:1	1:1
Ford E450 Senior/Paratransit Cutaway	1	Yes	3	Lift	15	0	15	1:1	1:1
Ford E450 Senior/Paratransit Cutaway	1	Yes	2	Lift	18	0	18	1:1	1:1
Ford E450	1	Yes	4	Lift	18	0	18	1:1	1:1

Senior/Paratransit Cutaway									
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b. Vehicle Headway

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. CAPBM TRANSPORTATION SERVICES buses are scheduled with a variety of frequencies based generally on demand. Fixed routes are scheduled in 60-minute frequencies, with some increase in frequency during peak time with heavy rider volume. CAPBM TRANSPORTATION SERVICES provides service Monday-Friday. CAPBM TRANSPORTATION SERVICES will consider more frequent 15 to 30 minute service frequencies where ridership levels warrant and funding levels permit, and less frequent services where demand dictates.

Service/Mins	Weekday Peak	Weekday Off-Peak	Saturday Peak	Saturday Off-Peak	Sunday Peak	Sunday Off-Peak
Heights fixed route	60 min.	60 min.	n/a	n/a	n/a	n/a
Crosstown fixed route	60 min.	60 min.	n/a	n/a	n/a	n/a
Penacook fixed route	60 min.	60 min.	n/a	n/a	n/a	n/a
Complementary ADA Paratransit Demand Response	n/a	n/a	n/a	n/a	n/a	n/a
Senior Transit Demand Response	n/a	n/a	n/a	n/a	n/a	n/a

c. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than one (1) minute early and no more than five (5) minutes late. The CAPBM Transportation Services on-time performance objective is 90% or greater. CAPBM Transportation Services continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

d. Service Availability

CAPBM Transportation Services will distribute transit service so that 90% of all residents in the service area are within a ¼ mile walk of bus service.

Service Policies

FTA requires fixed route transit providers to develop a policy for service indicators. CAPBM Transportation Services has prepared the following policies for its transit system.

a. Distribution of Transit Amenities

CAPBM TRANSPORTATION SERVICES has over 125 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 customer service 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, CAPBM TRANSPORTATION SERVICES reserves the right to permanently remove the amenity.

b. Vehicle Assignment

With several practical considerations, CAPBM TRANSPORTATION SERVICES assigns buses to service so that the average age of the buses serving each route does not exceed the average age of the fleet.

Bus assignments consider the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route.



Exhibit A

Language Assistance Plan – Limited English Proficiency Study/Analysis

CAPBM Transportation Services distributed a language survey to its employees. The objective of the survey was to evaluate the needs of CAPBM Transportation Services who are not able to communicate in English. Full survey results can be found at <https://concordareatransit.com/wp-content/uploads/2023/08/CAPBM-Title-VI-Employee-Survey.pdf>.

The first question asked, In What Way(s) Do You Interact with CAPBM Transportation Services riders? The chart below illustrates the results.

Method of Interaction	Percent of Responses
Telephone	55.56%
Face to Face	77.78%
Email	22.22%
Fax	0

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	0.00
Sometimes	33.33%
Rarely	66.67%
Never	0

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

Language	Percent of Interactions
English	95%
Spanish	1%
French, Haitian or Cajun	1%
Russian, Polish or other Slavic languages	.5%
Chinese including Mandarin, Cantonese	.5%
Other Asian or Pacific Island languages	1%
Other and unspecified languages including unknown	1%

The survey asked, overall, how effective employees are in communicating with Limited English Proficient CAPBM Transportation Services passengers. The results are summarized below.

Effectiveness	Percent of Total Responses
Very Effective	12.5%
Moderately Effective	75.00%
Less Effective	0

Unable to Communicate	12.50%
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Community Partners

CAPBM Transportation Services also canvassed its community partners to assess the extent to which they came into contact with LEP populations. Full survey results can be found [HERE](#).

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?

Question	Community Action Program Belknap Merrimack	Regional Volunteer Driver Programs	Members of the Regional Coordinating Council
Do you encounter non-English speaking/reading people who need your services?	100% said yes they do encounter LEP populations	33% responded yes	14.3% responded yes
If so, what are the top three languages that you encounter?	Other than English the top three languages for this group are: <ol style="list-style-type: none"> 1. Spanish; 2. French, Haitian or Cajun; 3. Russian Polish or other Slavic languages 	<ol style="list-style-type: none"> 1. Spanish 2. Chinese including Mandarin and Cantonese 3. Other and unspecified languages including unknown 	<ol style="list-style-type: none"> 1. Other Asian or Pacific Island languages 2. Other and unspecified languages including unknown
How do you address language barriers?	<ol style="list-style-type: none"> 1. Use a translation service 2. Use a translation smart phone app 3. Applicants bring someone with them to translate 	<ol style="list-style-type: none"> 1. Use a translation Service. 2. Use the language translator phone app Translator 	<ol style="list-style-type: none"> 1. Most responded they don't have any issues, so they don't employ any method 2. Bi-lingual staff translate 3. Relatives translate for them 4. Hire interpreters
Do you find language to be a barrier in preventing you from providing service?	20% responded yes	16% responded yes	0% responded yes

Consulting Directly with the LEP Population

In addition to the U.S. Census, American Community Survey data, employee survey, and outreach to community partners, CAPBM Transportation Services surveys its riders annually for customer satisfaction. For the last three years, initially due to the pandemic, CAPBM Transportation Services employs volunteers to call each of its demand response riders with responses entered into an online survey using Survey Monkey. None of the volunteers in the past three years have expressed any communication issues due to limited English proficiency. Full survey results for calendar year 2022 (<https://concordareatransit.com/wp-content/uploads/2023/08/Transportation-Services-Customer-Service-Survey-2022.pdf>) and 2023 (<https://concordareatransit.com/wp-content/uploads/2023/08/Transportation-Services-Customer-Service-Survey-2023.pdf>).

