

**Grafton County Senior Citizens Council, Inc.
Title VI Program**

**Grafton County
Senior Citizens Council, Inc.
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www.gcsc.org

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I. INTRODUCTION

GCSCC'S COMMITMENT TO CIVIL RIGHTS

This update of **GCSCC** Transit's Title VI Program has been prepared to ensure that the level and quality of **GCSCC's demand response services** are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to **GCSCC's** riders and other community members. Additionally, through this program, **GCSCC** 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 **GCSCC** 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 **GCSCC'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), **GCSCC** 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 **GCSCC'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 GCSCC riders aware of its commitment to Title VI compliance, and their right to file a civil rights complaint, GCSCC has presented the following information at each of its senior centers and on each of its vehicles.

Your Civil Rights

Grafton County Senior Citizens Council, Inc. (GCSCC) operates its programs and services without regard to race, color, or 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 VI may file a complaint with GCSCC. For more information on GCSCC's civil rights program and the procedures to file a complaint, please contact 603-448-4897 or kvasconcelos@gcsc.org or visit our administrative office at 10 Campbell St., Lebanon, NH from 8 a.m.-4 p.m. A complaint may be filed directly with the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington DC 20590. For more information about GCSCC programs and services, visit www.gcsc.org. If information is needed in another language, please contact 603-448-4897.

Discrimination Complaint Procedures

GCSCC has established a process for clients 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 GCSCC may file a Title VI complaint by following the agency's Title VI Complaint policy below:

POLICY: **Nondiscrimination in Provision of Service**

ADOPTED/REVISED: **1/25/2005; 1/14/2013; 1/30/2017**

REVIEWED/AMENDED BY: **Program Planning and Evaluation Committee**

APPROVED: **1/30/2017**

All Grafton County Senior Citizens Council, Inc. programs and services adhere to a policy of nondiscrimination on the basis of race, color, or national origin. No person on the basis of race, color, or national origin will be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination in any program or activity of Grafton County Senior Citizens Council, Inc.

This policy extends to the entire organization and to all facilities and programs operated by Grafton County Senior Citizens Council, Inc.

Complaints of discrimination in the provision of human services may be directed to the Department of Health and Human Services, Office of Program Support, Health Facilities Administration, State Office Park South, 129 Pleasant Street, Concord, NH 03301. Telephone: 1-800-852-3345 ext. 4592 or 603-271-4592; TDD access 1-800-735-2964.

Complaints of discrimination in the provision of transportation services may be directed to the Department of Transportation, Bureau of Rail & Transit, P.O. Box 483, Concord, NH 03302-0483. Telephone: 603-271-2468. **GCSCC** will notify NHDOT of all formal complaints within five business days of receiving the complaint.

Complaints may be filed directly with FTA by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor –TCR, 1200 New Jersey Ave. SE, Washington, DC 20590.

The Procedure

If you believe that you have received discriminatory treatment by the **GCSCC** on the basis of race, color, or national origin, you have the right to file a complaint with the **GCSCC Executive Director**.

Methods of filing a complaint:

Complete the Complaint Form, and send it to:

Kathleen Vasconcelos, Executive Director
Grafton County Senior Citizens Council, Inc.
PO Box 433
10 Campbell St.
Lebanon, NH 03766-0433

Verbal complaints are accepted and transcribed by **administrative office staff**. To make a verbal complaint, call 603-448-4897 and ask for **an administrative office staff member**.

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

GCSCC has up to **thirty days** to investigate the complaint. If more information is needed to resolve the case, the **GCSCC** 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 **GCSCC's** investigator is not contacted by the complainant or does not receive the additional Information within thirty days, **GCSCC** can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue his or her 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 whose complaint is specifically in regard to the **GCSCC** transportation service 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

GCSCC maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming **GCSCC** that allege discrimination on the basis of race, color, religion, national origin, sex, disability, or age. 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 **GCSCC** in response, or final findings related to the investigation, lawsuit, or complaint.

As April 2020, there are no complaints pending which allege discrimination on the grounds of race, color, religion, national origin, sex, disability, age 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. GCSCC'S PUBLIC PARTICIPATION PLAN

Key Principles

GCSCC's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in GCSCC'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 GCSCC's decision making;
- The concerns of all participants involved will be considered in the decision-making process; and,
- GCSCC will seek out and facilitate the involvement of those potentially affected.

Through an open public process, GCSCC has developed a public participation plan to encourage and guide public involvement efforts and enhance access to GCSCC's 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 GCSCC uses to reach its clients.

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 GCSCC'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 - GCSCC communicates regularly, develops trust with clients 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. Transportation will be provided when applicable upon request.
- 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 - **GCSCC** develops and maintains partnerships with communities through the methods described in its public participation plan.
- Quality Input and Participation - That comments received by **GCSCC** are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

Objectives of the Public Participation Plan

GCSCC'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 - **GCSCC** will proactively reach out to and engage low income, minority and LEP populations from the **GCSCC** 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 – **GCSCC** will respond and incorporate appropriate public comments into service 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.

GCSCC will use its public participation plan when considering all service-related changes, major modifications to service availability and schedules, and other planning projects when:

- A change to the donation request policy and procedure is being considered;
- Advance reservation policy is reduced or increased;
- Area for available services is changed;
- An existing facility or area for service provision is proposed for elimination;
- Considering the total discontinuance of service in any area or on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds (plus or minus) **10%** of current total service hours;
- Service area change that affects more than **25%** of clients in the affected area(s); or
- Schedules are changed in any given area or group of service centers that reduces the total number of services by more than **25%** of the current level of services.
- For minor schedule and service changes not rising to the level of those above, **GCSCC** will post service change notices at affected facilities and on vehicles **sixty days** in advance of the change date.

GCSCC encourages participation from a variety of community, regional and state organizations to accommodate participation in its service planning and development process. It accommodates these organizations by:

- Seeking community, regional and state leaders to be members of the advisory councils for the eight centers throughout the county.
- Seeking community, regional and state leaders to be members of the **GCSCC** Board of Directors.
- Participating in community, regional and state wide committees as members or participants where **GCSCC** is able to promote and encourage participation in their programs and activities.
- Creates and distributes on a monthly basis newsletter from each of its eight centers that announce events and activities that are happening at the centers and inviting participation from the community.

GCSCC community partners are: (not all inclusive)

- The 56 towns and cities in Grafton County, and Plainfield NH
- Grafton County
- Various Chambers of Commerce in the town and cities in Grafton County
- The Regional Planning Commission in Grafton County
- The Regional Health Consortiums in Grafton County
- The four hospitals in Grafton County

Regional Partnership/Capital Programming

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

IV. GCSCC'S PUBLIC PARTICIPATION PROCESS

Outreach Efforts – Alerting Riders and Encouraging Engagement

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

While there may be minor variation in the outreach process from time-to-time, the outline below provides the general steps for engaging clients 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 **(for example, GCSCC's Program Planning and Evaluation Committee, detailed later in this program, will review all service change proposals)**;
3. Proposals are reviewed by **GCSCC's Program Planning and Evaluation Committee**;
4. If required, a NH-DOT or NH-DHHS review of the proposal is conducted;
5. If required, authorization from the **GCSCC** Board of Directors is sought to proceed to a public comment period;
6. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the **GCSCC** service area;
7. Public outreach materials and a program are developed with sensitivity to the need for communication in languages in addition to English;
8. Outreach in advance of public information sessions is released (using tool-box of mediums listed below);
 1. An Email is transmitted to **GCSCC** community partners;
 2. Local radio station(s) **are contacted**;
 3. The public comment period ends;
 4. A summary package is presented detailing the outcome of the public participation process along with staff recommendations;
 5. The final service change date is set;
 6. Outreach is conducted in advance of any service change;
 7. Bilingual system timetable and website are updated in advance of the proposed change.

Selection of Meeting Locations

When determining locations and schedules for public meetings, **GCSCC** will:

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

GCSCC Mediums

- Print – Newspapers and other periodicals
- Outdoor – Advertising on-board buses (interior)
- Website
- Web-Based Feedback
- Social Media – **GCSCC** uses Facebook at some locations to engage community
- Email
- Radio
- On-board Flyers – **GCSCC** regularly uses flyers to provide riders with details of service changes and schedules of public meetings and hearings.
- Direct 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, all comments are assembled into a single document for presentation to the **GCSCC** Board of Directors for consideration.

Identification of Stakeholders

Our Community Partners

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

Stakeholder List

Any community organization or person can be added to the **GCSCC** stakeholder list and receive regular communications regarding service changes by contacting the **GCSCC** administrative office at 603-448-4897. Local organizations and businesses can also request that a speaker from **GCSCC** attend their regular meeting at the same number or through the **GCSCC** website [www.gcsc.org].

V. Decision Making Bodies

Efforts are made to encourage participation from minorities and individuals representing the Limited English Proficient community on all **GCSCC** decision-making bodies.

Non-Elected Committees and Councils

At **GCSCC**, decisions regarding policy, service changes, capital programming and facility locations are made by **GCSCC**'s Board of Directors. **GCSCC**'s Board of Directors is composed of up to 18 members elected at the organization's annual meeting. The Board of Directors' Program Planning and Evaluation Committee holds ongoing meetings to help to guide decisions regarding all program-related issues important to the community and our clients. Meetings of the **GCSCC Board of Directors and the Program Planning and Evaluation Committee** are always open to the public, and are generally held at the Administrative Office, 10 Campbell St., Lebanon, NH. Contact **GCSCC** at 603-448-4897 for a current schedule or to request transportation as needed.

Program Directors' Committee

This employee-based internal committee is comprised of **GCSCC** supervisors and key staff. It meets regularly to discuss possible service modifications from the perspective of staff. Membership is voluntary and open-ended (i.e. members are not appointed and they may serve for as long as they desire) and changes from time to time.

Program Advisory Councils

Each **GCSCC** Program has a Program Advisory Council. Each Council meeting is open to the public and comprised of clients and volunteers representing various constituencies. At regular meetings, members discuss aspects of **GCSCC**'s services from the perspective of the public. This group offers an invaluable service to **GCSCC**. Each Program Advisory Council operates under **GCSCC** Guidelines and the agency's by-laws.

Body	Caucasian	African American	Hispanic	Asian	Race 4	Race 5
Board of Directors	15					
Program Planning and Evaluation Committee	5					
Program Directors' Committee	10					

VI. SUMMARY OF CHANGES

Service Change Evaluations Since 2012

GCSCC uses daily data collection aggregated at months' end, annual client satisfaction surveys, and annual reports for monitoring and measurement of service standards and policies for annual reviews. No annual review has led to service changes.

Program Specific Requirements

Title VI Monitoring

Previous monitoring was handled as included in GCSCC's contracts with the New Hampshire Department of Transportation and Department of Health and Human Services.

Demographic Service Profile

Because GCSCC 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

As of April 2020, GCSCC has vehicle procurement requests pending with the New Hampshire Department of Transportation as well as a transfer of congregate nutrition units to home delivered meals units and emergency funds through the New Hampshire Department of Health and Human Services.

Civil Rights Compliance Reviews in the Past 3 Years

GCSCC has not been the subject of any such reviews.

Recent Annual Certifications and Assurances

GCSCC executed its most recent Certifications and Assurances to the FTA via the New Hampshire Department of Transportation and will continue to execute certifications and assurances when required.

Contact

For additional information on the GCSCC 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:

Kathleen Vasconcelos, Executive Director
Grafton County Senior Citizens Council, Inc.
10 Campbell St., PO Box 433
Lebanon, NH 03766-0433
603-448-4897
Kvasconcelos@gcsc.org

VIII. LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency (LEP)

In order to ensure meaningful access to programs and activities, **GCSCC** uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps **GCSCC** 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 **GCSCC**;
2. The frequency with which LEP persons come into contact with **GCSCC** services and programs;
3. The nature and importance of **GCSCC**'s services and programs in people's lives; and
4. The resources available to **GCSCC** for LEP outreach, as well as the costs associated with that outreach.

Factor 1 – Number of LEP Persons in Service Region and Service Area Overview

GCSCC's service area encompasses approximately 1,747 square miles of Grafton County. Among people at least five years old living in Grafton County, New Hampshire in 2014-2018, 6.7 percent spoke a language other than English at home. Spanish was spoken by 1.1 percent of people at least five years old; 1.4 percent reported that they did not speak English "very well."

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter **GCSCC**'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. Data for this review is derived from the United States Census and the American Community Survey. Data is reviewed by **GCSCC**'s Program Planning and Evaluation Committee and Program Directors' Committee.

	Percent
Spanish	1.1
Other Indo-European languages	2.9
Asian and Pacific Islander languages	2.2
Other languages	0.4

Factor 2 – Frequency of LEP Use

There are many places where **GCSCC** clients and members of the LEP population can come into contact with **GCSCC** services including the use of demand response buses, calls to Senior Centers, counseling sessions with outreach workers and ServiceLink counselors, and **GCSCC**'s outreach materials. An important part of the development of **GCSCC**'s Language Access Plan is the assessment of major points of contact, including:

- The use of the bus service (driver language skills)
 - In consultation with **GCSCC** bus operators, there are no known instances in which communications with an LEP individual has presented a barrier in communication and access to the program. Should these staff encounter an LEP individual, they are able to quickly access the Language Bank of Ascentria Community Services, Inc. via the Dispatcher to assist in translation.
- Communication with **GCSCC**'s Senior Centers to reserve rides or access other services
 - **GCSCC** dispatchers, call center representatives and management are the primary staff responsible for answering calls related to **GCSCC** services. In consulting with these staff, there are no known instances in which communications with an LEP individual has presented a barrier in communication and access to the program. Should these staff encounter an LEP individual, they are able to quickly access Language Bank of Ascentria Community Services, Inc. to assist in translation.
- On site visits
 - **GCSCC** Administrative staff has been the primary staff responsible for greeting individuals who visit the program on-site. In consulting with administrative staff, there are no known instances in which communications with an LEP individual has presented a barrier in communication and access to the program. Should these staff encounter an LEP individual, they are able to quickly access Language Bank of Ascentria Community Services, Inc. to assist in translation.
- Printed outreach materials
 - **GCSCC** has not received any requests for service or accommodations for an individual for whom difficulty with English presented a barrier in communication and access to the program.
- Web-based outreach materials
 - **GCSCC** has not received any requests for service or accommodations for an individual for whom difficulty with English presented a barrier in communication and access to the program.
- Public meetings
 - **GCSCC** has not participated in any public meetings or hearings at which communications with an LEP individual has presented a barrier in communication and access to the program

GCSCC will distribute a language survey to its employees and add the results to the table below. The objective of the survey will be to evaluate the needs of **GCSCC** customers who are not able to communicate in English. The method of interaction for the survey was as follows.

Method of Interaction	Percent of Responses
Email	100%

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

Frequency of Interaction	Percent of Responses
Daily	0
Weekly	0
Monthly	20%
Less frequently Than Monthly	80%

Next, the survey will ask employees to identify which languages are encountered. The chart below outlines the results.

Language	Percent of Interactions
Spanish	80%
Portuguese	10%
Difficulty speaking or writing English although native English speaker	10 %
Other (Japanese, German,)	0

Community Partners

By participating in the Regional Coordinating Council, the State Coordinating Council, and the NH Transit Association as well as a maintaining a collaborative relationship with the NH Department of Transportation, **GCSCC** has consulted with several regional agencies to identify common practices in New Hampshire for working with LEP populations.

Factor 3 – The Importance of GCSCC Service to People’s Lives

Access to the services provided by **GCSCC** are critical to the lives of many in the service area. Many depend on **GCSCC**’s services for access to jobs and for access to essential community services such as schools, shopping and medical appointments. Riders eligible for service under the Americans 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.

If limited English proficiency is a barrier to using these services, then the consequences for individuals could limit their access to obtain health care, education or employment. Critical information from **GCSCC** which can affect access includes:

- Schedule information
- Request for donation information
- Information regarding making the best use of the service system (How To)
- Safety and security announcements

- Complaint and comment forms
- Outreach related to opportunity for public comments
- Information about other special programs
- What to do in an emergency (where to look for service change announcements)

The following notice is posted at all GCSCC facilities, including vehicles

POLICY: **Nondiscrimination in Provision of Service**

ADOPTED/REVISED: **1/25/2005; 1/14/2013; 1/30/2017, 1/30/2017**

REVIEWED/AMENDED BY: **Program Planning and Evaluation Committee**

APPROVED: **Pending Approval**

All Grafton County Senior Citizens Council, Inc. programs and services adhere to a policy of nondiscrimination on the basis of race, color, or national origin. No person on the basis of race, color, or national origin will be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination in any program of activity of Grafton County Senior Citizens Council, Inc.

This policy extends to the entire organization and to all facilities and programs operated by Grafton County Senior Citizens Council, Inc.

Complaints of discrimination in the provision of human services may be directed to the Department of Health and Human Services, Office of Program Support, Health Facilities Administration, State Office Park South, 129 Pleasant Street, Concord, NH 03301. Telephone: 1-800-852-3345 ext. 4592 or 603-271-4592; TDD access 1-800-735-2964.

Complaints of discrimination in the provision of transportation services may be directed to the Department of Transportation, Bureau of Rail & Transit, P.O. Box 483, Concord, NH 03302-0483. Telephone: 603-271-2468.

Factor 4 – Resources and Costs for LEP Outreach

GCSCC has committed resources to improving access to its services and programs for LEP persons. GCSCC has contracted with The Language Bank of Ascentria Community Services, Inc., a state-approved firm to provide translation services if and when necessary for clients to access fully GCSCC services.

GCSCC also has a staff person available to translate for Spanish speaking clients.

To date, the costs associated with these efforts fit within the **GCSCC**'s operating budget. Costs are predominantly associated with translation services and material production.

Outcomes

New tools and alerting riders of language assistance

Following the "Four Factor Analysis", **GCSCC** concluded that, while the agency has put some systems in place for the Language(s) speaking LEP population of the service area, additional services would assist other LEP populations regardless of the total population in the region.

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 regional partners;
- ◆ Ongoing review of requests for translator services; and
- ◆ Post Event Assessments (PEA)

Post-Event Assessments

Following service changes and planning projects, assigned program directors and/or administrators 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

GCSCC conducts annual program director (supervisor) training on how to use LEP translation services that are available to the public and how to inform clients of services available for LEP populations.

Employee awareness training for the ability to basically communicate with the LEP and low-literacy population.

Translation of Vital Documents

After conducting above surveys, **GCSCC** will consider translating vital documents into other languages, as warranted. The list of documents that are under consideration for translation is provided below:

- ◆ Civil Rights Complaint Form
- ◆ Service change announcements
- ◆ Notification of free language services
- ◆ Service Complaint Forms