

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

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

**[www.gcsc.org](http://www.gcsc.org)**

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# I. INTRODUCTION

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## 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, religion, national origin, sex, disability, or age 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, religion, national origin, sex, disability, or age 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, religion, national origin, sex, disability, or age 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](mailto:kvasconcelos@gcsc.org) or visit our administrative office at 10 Campbell St., Lebanon, NH from 8 a.m.- 4 p.m. For more information about GCSCC programs and services, visit [www.gcsc.org](http://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, religion, national origin, sex, disability, or age 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**

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All Grafton County Senior Citizens Council, Inc. programs and services adhere to a policy of nondiscrimination on the basis of race, color, religion, national origin, sex, sexual orientation, disability, or age. No person on the basis of race, color, national origin, creed, sex, sexual orientation or age 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.

Grafton County Senior Citizens Council, Inc. adheres to a policy of nondiscrimination on the basis of disability. No otherwise qualified person with a disability shall be, solely by reason of that disability, excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any program or activity of 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.

### **The Procedure**

If you believe that you have received discriminatory treatment by the GCSCC on the basis of race, color, religion, national origin, sex, disability, or age 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 of the writing of this program, 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. Updated data are attached (11/16)

#### 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.
- 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: (non 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;
- 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](http://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.

**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.

<b>Body</b>	<b>Caucasian</b>	<b>African American</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Race 4</b>	<b>Race 5</b>
<b>Board of Directors</b>	16					
<b>Program Planning and Evaluation Committee</b>	4					
<b>Program Directors’ Committee</b>	10					

## **VI. SERVICE STANDARDS AND POLICIES**

**GCSCC** has developed a set of quantifiable service standards and policies. These service standards are updated annually through a public participation process, approved by **GCSCC**'s Board of Directors and with the input of **GCSCC**'s Program Planning and Evaluation Committee and Program Directors' Committee.

These service standards and policies include:

- ◆ Service Availability
- ◆ Expectations regarding level of service

Following the internal updating of these policies and standards, **GCSCC** advertises and holds a public information session to receive comments on the proposed standards. During the session, **GCSCC** staff presents an overview of the components of **GCSCC**'s public participation process as well as the various policies and standards. A copy of the presentation is available by contacting **GCSCC**.

### **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 per day	Maximum Load
Ford 350	8+2		10		7.6	10

### **Vehicle Headway (Frequency); On-Time Performance**

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. **GCSCC** buses are scheduled with a variety of frequencies and all operate on a demand-response basis.

**GCSCC** issues a client satisfaction survey to riders annually and asks the question about on-time performance (as relevant to a demand-response system). Client satisfaction ratings have been 90% or higher historically regarding the timeliness of the service.

### **Service Availability – Access to the Bus**

GCSCC currently provides demand-response transit services and is committed to serving older adults and adults with disabilities within Grafton County.

**Vehicle Assignment Policy**

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

**Monitoring Service Standards**

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

<b>Service Standard/Policy</b>	<b>Sample Schedule</b>	<b>Methodology</b>
Vehicle Load	All vehicles monthly	Daily data collection aggregated at month's end
Vehicle Headway	Assessed Annually as Part of Service Planning	Quarterly and annual review of data; client satisfaction survey annually
On-time Performance	Assessed annually	Survey data
Service Accessibility	Assessed Annually as Part of Service Planning	Monthly, quarterly, annual reports; annual survey
Vehicle Assignment Policy	Assessed Quarterly and Annually	Review of quarterly and annual reports; annual survey

## **VII. SUMMARY OF CHANGES**

### **Service Change Evaluations Since 2012**

There have been no additional changes of service since 2012.

### **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.

## **VIII. GRANTS, REVIEWS AND CERTIFICATIONS**

### ***Pending Applications for Financial Assistance***

As of January 31, 2019 GCSCC has no pending applications for support through the New Hampshire Department of Health and Human Services and the New Hampshire Department of Transportation.

### ***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](mailto:Kvasconcelos@gcsc.org)

## **IX. 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 and is home to a population speaking more than 37 different languages. Of the total service area population, of 85,417 fewer than 2% of residents report speaking English less than very well. The most populous groups in the category are shown below.

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.

To do this, **RLS** 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 are derived from the United States Census and the American Community Survey. Data are to be reviewed by **GCSCC**'s Program Planning and Evaluation Committee and Program Directors' Committee.

<b>Total:</b>	<b>85,417</b>	
<b>Speak English Less than Very Well</b>	<b>1451</b>	<b>1.7%</b>

Speak English "Less than very well"	Population in the Language Group	Percent of Total Population
Spanish or Spanish Creole:	444	0.5%
French (incl. Patois, Cajun):	233	0.3%
Chinese:	323	0.4%
German:	21	0.0%
Russian:	49	0.1%
Polish:	6	0.0%
Serbo-Croatian:	25	0.0%
Armenian:	10	0.0%

Gujarati:	5	0.0%
Hindi:	13	0.0%
Other Indic languages:	10	0.0%
Japanese:	35	0.0%
Korean:	48	0.1%
Thai:	11	0.0%
Vietnamese:	18	0.0%
Other Asian languages:	3	0.0%
Tagalog:	38	0.0%
Arabic:	154	0.2%
African languages:	5	0.0%

**Factor 2 – Frequency of LEP Use**

There are a large number of 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);
- Communication with **GCSCC**'s Senior Centers to reserve rides or access other services;
- Printed outreach materials;
- Web-based outreach materials;
- Public meetings;
- Local news media (print and radio);

**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 first question asked: In What Way(s) Do You Interact with **GCSCC** clients?

Method of Interaction	Percent of Responses
Telephone	100%
Face to Face	100%
Email	87.5%
Fax	37.5%

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
Often	
Sometimes	12.5%
Rarely	75%

Never	12.5%
-------	-------

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

Language	Percent of Interactions
Spanish	Infrequently 25%
French	Infrequently 12.5%
Chinese	
Other (Japanese, German, Difficulty speaking or writing English although native English speaker)	Infrequently 50%

The survey will ask, overall, how effective employees are in communicating with Limited English Proficient GCSCC clients. The results will be summarized when compiled.

Effectiveness	Percent of Total Responses
Very Effective	
Moderately Effective	37.5%
Less Effective	37.5%
Unable to Communicate	25%

### Community Partners

GCSCC also will canvass its community partners to assess the extent to which they came into contact with LEP populations. Community partners will be 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?

### Consulting Directly with the LEP Population

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

### **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**

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

**APPROVED:** **1/30/2017**

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All Grafton County Senior Citizens Council, Inc. programs and services adhere to a policy of nondiscrimination on the basis of race, color, religion, national origin, sex, sexual orientation or age. No person on the basis of race, color, national origin, creed, sex, sexual orientation, disability, or age 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.

Grafton County Senior Citizens Council, Inc. adheres to a policy of nondiscrimination on the basis of disability. No otherwise qualified person with a disability shall be, solely by reason of that disability, excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any program or activity of 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 NH-DOT of all formal complaints within five business days of receiving the complaint.

#### **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.

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. After conducting the surveys noted above, GCSCC will determine the specific services and methods to be added to assist LEP populations.

#### **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 five 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