



Ready Rides

## **Title VI/Non-Discrimination Program and Plan FY2019-2022**

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## **I. INTRODUCTION**

Ready Rides certifies that transit operations overseen by Ready Rides in its nine town community service area in Strafford and Rockingham Counties, New Hampshire are operated in a manner which is in full compliance with existing regulations summarized in FTA Circular C.4702.1B.

Ready Rides policies regarding non-discrimination and respect for diversity ensure that all Ready Rides service will be provided without regard to race, color, or national origin. Ready Rides is designed to be fully accessible, open to the public, and intended to maximize access to transportation for all residents, and visitors to the Ready Rides service area, including and especially individuals with disabilities, older adults, and low income residents.

To ensure this compliance, Ready Rides will compile, maintain, and submit in a timely manner the required documentation of quality and level of service as defined by Title VI information required by FTA Circular 4702.1B and the Department of Transportation's Title VI regulation, 49 CFR Part 21.9. Our adopted policies and our ongoing operations ensure that individuals may provide input and comment on our services.

This document and its attached appendices are intended to comprise Ready Rides Title VI Program submittal.

## **II. OBJECTIVES**

Ready Rides has in place a Program based on Title VI of the Civil Rights Act of 1964 (42 U.S.C Section 2000d) and U.S.D.O.T. Regulation 49 CFR Part 21 "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation". The Program is based on Federal Transit Administration Circular FTA C 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients", October 1, 2012. The objectives of the program are as follows:

- A. Ensure that the level and quality of transportation service is provided in a nondiscriminatory manner:
- B. Promote the full and fair participation of all affected populations in transportation decision-making;
- C. Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations, and
- D. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

Section 601 of Title VI of the Civil Rights Act of 1964 is the statutory authority for Ready Rides Title VI Program and states:

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefit of, or be subjected to discrimination under any program or activity receiving Federal Assistance.

## **II. GENERAL REQUIREMENTS**

As part of Ready Rides Title VI/Non-Discrimination Program, the transit system maintains certain reporting requirements and provides the Federal Transit Administration the following information regarding these reporting requirements.

### **A. Requirement to Provide an Annual Title VI Certification and Assurance**

Ready Rides shall submit its annual Title VI Assurance as part of its Annual Certificate submission to the New Hampshire Department of Transportation (NHDOT). Ready Rides is a sub-recipient of Federal Transit Administration Section 5310 funding from the New Hampshire Department of Transportation, with this funding passed through the Lead Agency for the Regional Coordinating Council for Community Transportation (RCCs) covering the Ready Rides service area. The Lead Agency being the Cooperative Alliance for Seacoast Transportation (COAST) for the Southeast NH Regional Coordination Council (Region 10 RCC, also known as the Alliance for Community Transportation or ACT).

### **B. Requirement to Notify Beneficiaries of Protection under Title VI**

Ready Rides has established methods for notifying the public regarding its Title VI obligations, how to get more information regarding Ready Rides non-discrimination obligations, and procedures for filing a discrimination complaint against Ready Rides. The public notice is included in Appendix A. The public notice will be posted on Ready Rides website, and in public areas of operation and at the administrative facility.

### **C. Requirement to Develop Title VI Complaint Procedures and Complaint Form**

Ready Rides has procedures for investigating and tracking Title VI complaints that may be filed against us and for making these procedures available to members of the public upon request. Should Ready Rides have any sub-recipients in the future, they will be required to have such procedures and be encouraged to adopt Ready Rides complaint investigation and tracking procedures.

Copy of Ready Rides Title VI/Non-Discrimination Complaint and Investigation Procedures is included in Appendix B. A copy of Ready Rides Complaint Form is included in Appendix C. These specific Title VI/Non-Discrimination complaint procedures were adopted by the Ready Rides Board of Directors on February 20th., 2020. Ready Rides has followed Title VI Non Discrimination practices since its inception in 2013. The Ready Rides Title VI Coordinator is the Volunteer Coordinator, reachable at Ready Rides P.O. Box 272 Northwood NH 03261. Complaints would be addressed to the Title VI Coordinator.

D. Requirement to Record and Report Transit Related Title VI Investigations, Complaints and Lawsuits

In compliance with 49 CFR Section 21.9(b), Ready Rides shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming Ready Rides alleging discrimination on the basis of race, color, or national origin. This list shall include the date the investigation, lawsuit, or complaint was filed and received by Ready Rides, a summary of the allegation(s), the status of the investigation, lawsuit or complaint, and actions taken by Ready Rides in response or final findings related to the investigation, complaint or lawsuit.

Ready Rides form for recording this information is included in Appendix D. The list shall comprise all of the records of active investigations, lawsuits, and complaints recorded on these forms. During the processing of active investigations, lawsuits, or complaints, the Title VI Coordinator shall update the record form as necessary. Upon resolution and closure of an investigation, lawsuit or complaint, the Title VI Coordinator shall record such closure on this form. Ready Rides Title VI Investigation, Complaint, or Lawsuit Summary Form is included in Appendix E.

Ready Rides has been a sub recipient of FTA Section 5317 since FY14 (October 2013), and 5310 Purchase of Service funding in January 2014. As of this writing, Ready Rides has neither incurred any Title VI complaints and investigations, nor have any lawsuits of a Title VI nature or otherwise been filed against Ready Rides.

E. Minority Representation on Planning and Advisory Bodies

Title 49 C.F.R. 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Ready Rides has no active transit related non-elected planning boards, advisory councils or committees, or similar committees. Board membership is based on the By laws as established and approved by Ready Rides Board of Directors. Members are recruited from all areas, and interests, while also looking to include diversity on the basis of race, color or national origin.

Ready Rides Board is made up of 14 individuals

Ethnic makeup of RR Board

European descent	13
African descent	1

F. Providing Assistance to, and Monitoring Sub recipients

Ready Rides is a sub recipient, and does not currently have any sub-recipients to which it extends Federal financial assistance. Should Ready Rides develop such a pass through relationship in the future it recognizes its obligation to assist the sub recipients in complying with U.S DOT's Title VI regulations, including general reporting requirements, and in monitoring sub recipients' compliance with U.S. DOT's Title VI regulations.

G. Determination of Site or Location of Facilities

Ready Rides has not built any facilities in the past three years. Ready Rides has no future plans to build a facility, but if that changes it will make all siting decisions after completing an equity analysis with regard to where facilities are sited to ensure the location is selected without regard to race, color, or national origin per Circular 4702.1B, Ch.III, Section 13.

H. Requirement to provide Additional Information Upon Request

Ready Rides will provide information other than that required by Circular 4702. 1B to FTA upon request should it be necessary to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

J. Requirement to Provide Meaningful Access to Persons with Limited English Proficiency

Ready Rides has taken and will continue to take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of its public transit program for individuals who are Limited English Proficient (LEP). FTA's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient ("LEP") Persons (70 FR 74087, December 14, 2005) defines LEP Persons as *"persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English."*

The following pages describe the four-part analysis of LEP populations described in Circular 4702.1B. These steps include: (1) identifying the number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee; (2) determining the frequency with which LEP individuals come in contact with the program; (3) defining the nature and importance of the program, activity, or service provided by

the recipient to people's lives; and (4) describing the resources available to the recipient for LEP outreach, as well as the costs associated with that outreach

*Identify the number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee;*

Table 1 on the following page shows data taken from the 2013-2017 American Community Survey data tables for primary language spoken at home for the Ready Rides Service Area and the most common languages spoken at home in the Ready Rides service area.

Ready Rides has undertaken an analysis of the languages spoken in the Nine towns where it provides transportation services, and the estimated number of residents with Limited English Proficiency and their distribution by language group and town. A summary of this data is included in the following pages. Table 4-LEP Population by Town and Language Group includes a comprehensive data table from the 2013-2017 American Community Survey regarding populations with Limited English Proficiency (LEP).

Note that there are significant concerns regarding the American Community Survey (ACS) data, which represent a much smaller survey sample, even with a 5-year compilation, than the old Census Long Form, from which information on income and poverty have previously been drawn. While the ACS data provide useful annual snapshots at the national, state and county levels, they contain very high margins of error for smaller towns, and especially for small sub-populations within towns. Nevertheless, they represent the best data available on poverty and ability to speak English since the 2000 Census, and the best data on race and ethnicity since the 2010 Census.

The ACS data identify more than 32 languages in addition to English spoken at home by residents of Ready Rides service area communities. Speakers in each language group self-identify as speaking English "Very Well" or "Less than Very Well"

The 2013-2017 ACS compilation estimates the New Hampshire population at 1,331,848 and the corresponding Ready Rides service area population at 51980. Of the total population in NH 92.1% speak only English and in the Ready Rides service area 92.7% of the population speak only English.

The two largest populations speaking a language other than English at home are the Hispanic/Latino population (identified by the census as speaking Spanish/Spanish Creole)

estimated at 26,293 or 2.1% of the total state population; and French speaking population, including Patois and Cajun, estimated at 21,848 or 1.7% of the state population. In the Ready Rides service area the estimated Spanish speaking population is 632 or 1.2% of the total service area population and French is 557 or 1% of the total service area population.

**Table 1 - Ready Rides Title VI Analysis - Language Spoken at Home**  
**Languages Spoken at Home in Transit Service Area**

*Source American Community Survey 2013-2017 5-Year Data Compilation*

<b>Geography</b>	<b>Speakers in ReadyRides</b>
Total Population	51980
Speak only English	48180
Spanish or Spanish Creole	632
French (incl. Patois, Cajun)	557
Chinese	529
Laotian	409
German	333
Portuguese or Portuguese Creole	109
Greek	102
Japanese	99
Other West Germanic languages	83
Other Indo-European languages	82
Italian	75
Russian	69
Polish	58
Mon-Khmer, Cambodian	57
Hungarian	54
Other Indic languages	52
Hindi	49
Other Slavic languages	47
Arabic	46
Vietnamese	41
Other Pacific Island languages	41
Persian	41
French Creole	40
Hebrew	40
African languages	34
Korean	27
Scandinavian languages	25
Other Asian languages	23
Thai	21

Tagalog	18
Other Native North American languages	4
Armenian	3
Serbo-Croatian/ Urdu/ Gujarati/ and other	0

Regarding ability to speak English, the ACS estimates indicate that of 632 speakers of Spanish/Spanish Creole over the age of 5 years, 234 individuals speak English Less Than Very Well, equating to 0.5% of the population of the Ready Rides service area.

*Determine the frequency with which LEP individuals come in contact with the program* There are six primary means by which an individual may come in contact with Ready Rides:

- 1) Ready Rides printed material - Ready Rides has not received any requests for accommodations/ service for an individual for whom difficulty with English presented a barrier in communication and access to the program
- 2) Ready Rides web site – Ready Rides has not received any requests for accommodations/service for an individual for whom difficulty with English presented a barrier in communication and access to the program.
- 3) Telephonically – Most Ready Rides transportation services are scheduled and dispatched through the TripLink’s call center, operated by COAST call center. Dispatchers and management at TripLink’s call centers are the primary staff responsible for answering calls related to Ready Rides services. Both call centers have staff that are bilingual in English and Spanish, but reported no instances where Spanish was needed or where communications with an LEP individual has presented a barrier in accessing Ready Rides program services or information. Both call centers have contracts for language interpretation services with Ascentria Care Alliance. More information on this service can be found at [www.thelanguagebank.org](http://www.thelanguagebank.org).

Staff at TripLink’s call center received training on Ready Rides Title VI policy on how to proceed if they receive a call from an individual with Limited English Proficiency or if communication is a barrier with an LEP rider on a Coast bus or vehicle that was contracted by Ready Rides to take a passenger who is in a wheelchair and needs wheelchair accessible rides.

4) On-site visit-

There are no known instances in which on-site verbal communications with an LEP



individual has presented a barrier in accessing program services. When new volunteers join they receive orientation on Ready Rides Title VI policy on how to proceed if they receive a call from an individual with Limited English Proficiency..

5) Riding on Ready Rides Volunteer drivers vehicles - In consultation with Ready Rides volunteer drivers, no instances have been identified in which communications with an LEP individual has presented a barrier in accessing program services or information. Should these volunteers encounter an LEP individual they are able to call TripLink's to assist in translation.

6) Public meeting, hearings or community events - Ready Rides has participated in many public meetings, hearings, and community events, but staff are not aware of any public meeting, hearing or community events at which communications with an LEP individual has presented a barrier in in accessing program services or information.

From our experience, and the data, the number or proportion of LEP individuals using the system is extremely limited, and interactions are infrequent, which is consistent with the Census data analysis for the region.

Define the nature and importance of the program, activity, or service provided by the recipient to people's lives

Ready Rides has been organized to provide rides to medical related appointments for seniors and the physically challenged. We have increased the towns we serve to 9 communities which are Barrington, Durham, Lee, Madbury, Newfields, Newmarket, Northwood, Nottingham and Strafford. Ready Rides will keep seniors and the physically challenged as independent as possible by providing them free access to health care. The rides will be provided by volunteers who have gone through a vetting process, Ready Rides recognizes the importance of access to transportation for all community residents.

Describe the resources available to the recipient and costs

Ready Rides has consulted with COAST to identify common practices in New Hampshire for working with LEP populations, The ACS 2013-2017 data used for the analyses included in this document show no LEP population approaching the 5% threshold. Across all language groups the LEP population totals 1.6% of the population. The 2013-2017 data also show no language group with 1,000 or more LEP individuals in the region. The dataset identified 234

LEP individuals among speakers of Spanish/Spanish Creole, or approximately 0.5% of the total population. Ready Rides does not charge for the rides we provide, our service is free.

The Language Assistance Plan Implementation Matrix included as Appendix F summarizes action steps planned for FY2020-FY2022. Ready Rides is committed to continuing to improve

access to Ready Rides services for all LEP individuals in the Ready Rides service area.

#### K. Promoting Inclusive Public Participation

To date Ready Rides has used a number of strategies to solicit input in planning and implementation of its regional transit service from riders, organizations serving transit dependent populations in the region, and members of the public:

Regional Coordinating Councils for Community Transportation (RCC): Ready Rides staff participate actively in the Southeast NH RCC (also known as ACT), covering 23 communities in eastern Rockingham County, all of Strafford County and two communities in southern Carroll County. This is one of ten such Regional Coordinating Councils established throughout New Hampshire based on the State of New Hampshire's 2006 State Transit Coordination Plan. The RCCs serve as a forum for information exchange and cooperative data gathering, assessment of regional community transportation needs, service planning, and project prioritization. The RCCs also serve as the advisory committees for the development of the Coordinated Public Transit/Human Services Transportation Plans for the two regions. RCC members include a range of non-profit and for-profit transportation providers, municipalities and other purchasers of transportation, and citizen representatives. All meetings of the RCC are held during service hours for COAST and are accessible via transit for residents of communities served by those transit systems.

#### Meetings with Municipal Staff and Presentations to Communities:

Ready Rides staff and/or Board members, or their agency designee, meet typically once a year (more frequently if requested) with municipal staff from Ready Rides member communities, which may include Human Service Directors, Community Development Directors, and Town Managers. These meetings serve as opportunities to gather input on community need as well as present operations data and funding requests for various agency functions.

Consultation with Regional Health & Human Service Agencies: As part of the most recent update to the two RCC regions' Coordinated Public Transit/Human Services Transportation Plan, surveys were conducted of municipal Human Services Directors and non-profit Health & Human Service agencies working with transit dependent populations, including seniors, individuals with disabilities and low income residents. Surveys asked about the transportation needs among community residents and agency clients.

Public Outreach Meetings - Ready Rides staff and/or Board members, or their agency designee have given numerous presentations and attended public events to promote the Ready Rides system and solicit public input.

Rider Surveys -Ready Rides annually conducts rider surveys with a series of questions regarding demographics, rating customer service, the scheduling process, system on time performance, overall satisfaction with Ready Rides transit service and ease of understanding of the system.

Opportunity for Public Comment at Ready Rides Board Meetings: A period for public comment is included on the agenda of Ready Rides regular Board Meetings, typically held on the third Thursday of every month at Northwood Congressional church, 881 First New Hampshire Turnpike Northwood, NH 03261

G. Providing Assistance to Sub recipients

Ready Rides is itself a sub-recipient of FTA Section 5310 funding through the NH Department of Transportation via COAST, ACT, Ready Rides has received assistance with Title VI compliance from them.

H. Monitoring Sub recipients

As noted above Ready Rides does not have sub-recipients for its FTA funding. NHDOT, COAST will all play a role in monitoring Ready Rides's compliance with federal regulations as a sub-recipient of FTA funding.

I. Determination of Site or Location of Facilities

Ready Rides does not own or operate, or have plans to construct, own or operate the types of facilities to which this provision applies, which "*include but are not limited to storage facilities, maintenance facilities, operations centers, etc.*" (Circular 4702.1B, page III-11). Should such facilities be planned in the future, Ready Rides acknowledges its obligation to make siting decisions consistent with its policy of non-discrimination as described in Appendix B.

J. Requirement to Provide Additional Information Upon Request

Ready Rides will provide information other than that required by Circular 4702.1B to FTA upon request, should it be necessary to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

**III. REQUIREMENTS FOR FIXED ROUTE TRANSIT PROVIDERS**

Ready Rides does not operate or provide under contract any fixed route transit. Ready Rides provides a demand response transit.

**IV. ADDITIONAL DEMOGRAPHIC DATA**

In addition to the analysis of populations with Limited English Proficiency summarized in the

previous section, the Rockingham Planning Commission has prepared a demographic analysis of minority populations and low income populations for the nine (9) towns where Ready Rides provides transportation services. Data are drawn from the 2013-2017 American Community Survey five-year data compilation.

These analyses utilize municipal boundaries as the sampling unit, and document municipalities which exceed: 1) average minority population ratios; and 2) the average percentage of households falling below federal poverty guidelines. These analyses are summarized in Tables 2 and 3.

### Minority Population

Table 2 shows the number of individuals and the percentage of total population identified in the 2013-2017 American Community Survey five-year data compilation as Black, American Indian Native Alaskan, Asian, Hawaiian/Pacific Islander, Other Race and Two or more races. These ACS data provide the most current picture available of the region's population.

Across Ready Rides service area the average minority population is 8.5%. 3 communities in the region contain minority populations exceeding the region-wide average, with minorities making up between 10.5% and 13.3% of the total population in these towns. These towns include Durham (10.5%), New Market (11.7%), Lee (13.3%).

### Low Income Population

Table 3 identifies the number of individuals and the percentage of total population with household incomes falling below the federal poverty level according to the 2013-2017 American Community Survey five-year data compilation. Across the municipalities in the service area, the share of households below the federal poverty line is estimated at 7.9%. Statewide for this same ACS dataset approximately 8.1% of the population falls below the federal poverty line, while nationally an estimated 14.6% of the population lives in poverty.

Two communities in the Ready Rides region have percentages of impoverished households that exceed this regional average. These include Durham (24.2%), Northwood (8.5%).

## **Appendix A**

Ready Rides Title VI Notice to the Public

## Ready Rides Title VI Notice to the Public

Ready Rides gives notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which Ready Rides receives Federal Financial Assistance. To request a copy of Ready Rides Title VI Program, contact Ready Rides Title VI Coordinator.

Any person who believes that he or she has, individually, or as a member of any group, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any Ready Rides service, program or activity, and believes discrimination is based upon race, color, or national origin has the right to file a formal complaint.

Complaints will be accepted in writing and may be filed with Ready Rides Title VI Coordinator at the address below. A signed written complaint must be submitted within 180 days of the alleged discriminatory act (or latest occurrence). Individuals may also file complaints directly with the US Department of Transportation (USDOT), and/or the Federal Transit Administration (FTA) within the 180-day timeframe. Complaints filed directly with USDOT and or FTA are transit related complaints.

Complaints should include, at a minimum, the following information:

- Your name, address, and a telephone number where you can be reached during business hours;
- A general description of the person(s) injured by the alleged discriminatory act(s);
- A description of the alleged discriminatory act(s) in sufficient detail to enable the Title VI Coordinator to understand what occurred, when it occurred, and the basis of the alleged discrimination regarding race, color, or national origin.
- The letter must be signed and dated by the person filing the complaint or by someone authorized to do so on his or her behalf.

For a Title VI Complaint Form, or for more information regarding civil rights complaints, please contact,

Ready Rides Title VI Coordinator

P.O. Box 272 Northwood NH 03261

PH: 244-8719

If the Complainant is dissatisfied with Ready Rides resolution of the complaint, he/she has the right to file a complaint with the:

**Federal Transit Administration  
Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590**

## **Appendix B**

### **Ready Rides Title VI Complaint and Investigation Procedures**



# Ready Rides

## Title VI Complaint and Investigation Procedures

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by the Ready Rides

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of information mediation meeting between the affected parties and Ready Rides may be utilized for resolution.

Any person, group of people or entity that believes it has been subjected to discrimination prohibited under Title VI and related statutes may file a written complaint to the following address:

**Title VI Coordinator Ready Rides  
P.O. Box 272  
Northwood, NH 03261**

The following measures will be taken to resolve complaints filed under Title VI and related statutes:

- 1) A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her legal representative, and will include the Complainant's name, address and telephone number/ the name of alleged discriminating official; the basis for the complaint (race, color, or national origin), and the date of the alleged acts. A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.
- 2) In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Coordinator. Under these circumstances, the Complainant will be interviewed, and the Title VI coordinator will assist the Complainant in converting the verbal allegations to writing.

- 3) When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant within ten (10) days by registered mail.
- 4) If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
- 5) Within 15 business days from the receipt of a complete complaint, Ready Rides will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) business days of the decision to proceed with an investigation or not, the Chairman, or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition. a. If the decision is made to not investigate the complaint, the notification shall specifically state the reason for the decision. b. If the complaint is to be investigated, the notification shall specifically state the grounds of Ready Rides jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 6) When Ready Rides does not have sufficient jurisdiction, the Chairman, or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
- 7) If the complaint has investigative merit, the Chairman or his/her authorized designee will assign an investigator. A complete investigation will be conducted, and an investigative report will be submitted to the Chairman within 60 days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.
- 8) The Chairman, or his/her authorized designee will issue letters of finding to the Complainant and Respondent within 90 days from receipt of the complaint.
- 9) If the Complainant is dissatisfied with Ready Rides resolution of the complaint, he/she has the right to file a complaint with the:

**Federal Transit Administration  
Office of Civil Rights**

**1200 New Jersey Avenue SE  
Washington, DC 20590**

## **Appendix C**

### **Ready Rides Title VI Complaint Form**

# Ready Rides

## Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 states "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.:

Please provide the following information necessary in order to process your complaint. Should you require any assistance in completing this form, please let us know. Please complete this form and mail or deliver to

### **Title VI Coordinator**

**Ready Rides P.O. Box 272 Northwood, NH 03261**

You can reach our office from Monday - Friday from 9:00 am to 2:00 pm at 603-244-8719.

1. Name \_\_\_\_\_
2. Street Address \_\_\_\_\_
3. City, State, and Zip Code \_\_\_\_\_
4. Telephone number Home/Cell \_\_\_\_\_ Work, if applicable \_\_\_\_\_

5. Are you filing this complaint on your own behalf? \_\_\_yes\*\_\_\_ no

\*If yes, please continue to question #7.

If no, please supply the name of the person for whom you are filing this complaint and your relationship to him/her:

Name of person for whom you are filing this: \_\_\_\_\_

Your relationship to the person: \_\_\_\_\_

6. Have you obtained permission to file on behalf of the complainant \_\_\_yes\_\_\_ no

7. What was the alleged discrimination based on? Please check all that apply.

\_\_\_\_\_ Race      \_\_\_\_\_ Color      \_\_\_\_\_ National Origin

8. Date of incident resulting in the alleged discrimination \_\_\_\_\_

9. Please explain as clearly as possible what happened and why you believe you were discriminated against. Include the name and contact information of the person (s) who discriminated against you (if known), as well as the names and contact information of any witnesses. If additional space is needed, please attach sheets of paper or use the back of this form.

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10. Have you previously filed a Title VI complaint with this agency?  yes  no

11. Have you filed this complaint with any other federal, state, or local agency; or with a federal or state court?  yes  no

If yes, please check each agency the complaint was filed with:

Federal Agency  Federal Court  State Agency  State Court  Local Agency

12. Please provide the name of a contact person at the agency/court where the complaint was also filed, if it was: Name Address City, State, and Zip Code Telephone Number

Please sign below. You may attach any written materials or information you believe supports your complaint.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Please submit this form by mail to:

Title VI Coordinator  
Ready Rides  
P.O. Box 272 Northwood, NH 0303261

## **Appendix D**

### **Ready Rides Title VI Investigations, Complaints, and Lawsuits List**

# Ready Rides

## Title VI Investigations, Complaints, and Lawsuits List

### Investigations

Complainant	Date filed	Summary attached	Status	Action taken

### Complaints

Complainant	Date filed	Summary attached	Status	Action taken

**Lawsuits**

<b>Complainant</b>	<b>Date filed</b>	<b>Summary attached</b>	<b>Status</b>	<b>Action taken</b>



## **Appendix E**

### **Ready Rides Title VI Investigation, Complaint, or Lawsuits, Summary Form**

# Title VI Investigation, Complaint, or Lawsuit Summary Form (Ready Rides)

Complainant

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Basis for Complaint

---

Date Title VI complaint received

---

Summary of complaint allegation (s):

Action(s) Taken By

Date:

---

Date:

---

Date complaint resolved or closed:

---

Date Complainant Notified of Resolution:

---

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## **Appendix F**

### **Ready Rides**

#### **Title VI Analysis- Limited English Proficiency**

Ready Rides Title VI Analysis - Language Spoken at Home Table 1 - Languages Spoken at Home in Transit Service Area Source American Community Survey 2013-2017 5-Year Data Compilation

<b>Geography</b>	<b>Speakers in ReadyRides</b>
Total Population	51980
Speak only English	48180
Spanish or Spanish Creole	632
French (incl. Patois, Cajun)	557
Chinese	529
Laotian	409
German	333
Portuguese or Portuguese Creole	109
Greek	102
Japanese	99
Other West Germanic languages	83
Other Indo-European languages	82
Italian	75
Russian	69
Polish	58
Mon-Khmer, Cambodian	57
Hungarian	54
Other Indic languages	52
Hindi	49
Other Slavic languages	47
Arabic	46
Vietnamese	41
Other Pacific Island languages	41
Persian	41
French Creole	40
Hebrew	40
African languages	34
Korean	27
Scandinavian languages	25
Other Asian languages	23
Thai	21
Tagalog	18
Other Native North American languages	4
Armenian	3
Serbo-Croatian/Urdu/Gujarati/other	0

## Ready Rides Title VI Analysis - Population in Poverty

### Table 3 - Ratio of Income to Poverty Level by Municipality

Source: American Community Survey 2013-2017 5-Year Data Compilation

Geography	Total Population	Below 50% of Poverty Level	Below 100% of Poverty Level	Below 125% of Poverty Level	Below 150% of Poverty Level	Below 185% of Poverty Level	Below 200% of Poverty Level	Percent Below 100% of Poverty Level
Barrington	8,841	271	429	487	712	961	1,038	4.9%
Durham	8,466	1,357	2,046	2,230	2,298	2,705	2,751	24.2%
Lee	4,289	6	8	23	253	304	317	0.2%
Madbury	1,906	18	33	47	61	72	131	1.7%
Newfields	1,559	2	37	39	67	84	84	2.4%
Newmarket	8,904	397	656	902	1,424	1,896	2,154	7.4%
Northwood	4,282	9	366	411	536	573	624	8.5%
Nottingham	4,945	49	66	185	190	248	319	1.3%
Strafford	4,057	92	115	137	162	496	610	2.8%
<b>Ready Rides Service Area</b>	<b>47,249</b>	<b>2,201</b>	<b>3,756</b>	<b>4,461</b>	<b>5,703</b>	<b>7,339</b>	<b>8,028</b>	<b>7.9%</b>
United States	313,048,563	20,276,204	45,650,345	60,018,198	74,202,606	94,262,439	102,523,670	14.6%
New Hampshire	1,289,255	46,394	104,470	140,069	180,387	239,965	267,817	8.1%
Rockingham County	299,957	6,596	14,402	19,894	26,606	36,251	41,440	4.8%
Strafford County	117,505	5,139	11,127	15,102	19,794	25,533	27,663	9.5%

Ready Rides Title VI Analysis - Minority Population

Table 2A - Estimated Minority Population by Town

Source: American Community Survey 2013-2017 5-Year Data Compilation

Geography	Population Estimate	White	Black	American Indian/Alaska Native	Asian	Hawaiian/Pac Island	Some other Race	Two or More Races	Hispanic/Latino	Total Minority Population	Percent Minority
Barrington	8,841	8,563	0	8	167	0	0	103	147	425	4.8%
Durham	16,148	14,754	118	0	724	0	69	483	299	1,693	10.5%
Lee	4,375	3,991	3	0	322	0	2	57	197	581	13.3%
Madbury	1,906	1,799	0	2	59	0	9	37	9	116	6.1%
Newfields	1,559	1,452	12	6	19	0	30	40	26	133	8.5%
Newmarket	8,977	8,243	67	9	344	0	0	314	317	1,051	11.7%
Northwood	4,282	4,162	0	23	33	0	0	64	150	270	6.3%
Nottingham	4,962	4,948	0	0	0	0	0	14	37	51	1.0%
Stafford	4,057	3,946	38	0	21	0	0	52	228	339	8.4%
<b>Total Ready Rides Service Area</b>	<b>55,107</b>	<b>51,858</b>	<b>238</b>	<b>48</b>	<b>1,689</b>	<b>0</b>	<b>110</b>	<b>1,164</b>	<b>1,410</b>	<b>4,659</b>	<b>8.5%</b>
United States	321,004,407	234,370,202	40,610,815	2,632,102	17,186,320	570,116	15,553,808	10,081,044	37,092,413	123,726,618	38.5%
New Hampshire	1,331,848	1,244,260	18,632	2,148	33,313	289	7,016	26,190	33,150	120,738	9.1%
Rockingham County	302,479	287,519	2,214	384	5,808	0	1,628	4,926	5,743	20,703	6.8%
Stafford County	126,552	117,831	1,097	59	4,154	0	397	3,014	2,792	11,513	

**Ready Rides Title VI Analysis - Limited English Proficiency (LEP)**  
**LEP Populations by Town & Language Group**  
**Source: American Community Survey 2013-2017 5-Year Data Compilation**  
**Limited English Proficiency is defined by the Census Bureau as speaking English "Less than Very well"**

Geography	Barri ngton	Durh am	Lee	Mad bury	Newfi elds	Newm arket	Northw ood	Notting ham	Straff ord	R R Ser vice Are a	United States	New Hamp shire	Rocking ham County	Strafford County
Total Population	8249	15315	4201	1748	1497	8465	3997	4614	3894	51980	296603003	1258609	284992	118806
Speak only English	8011	13784	3718	1619	1459	7457	3857	4550	3725	48180	234171556	1159579	267068	110273
English Only % Tot Pop	97.1%	90.0%	88.5%	92.6%	97.5%	88.1%	96.5%	98.6%	95.7%	92.7%	79.0%	92.1%	93.7%	92.8%
Spanish/Spanish Creole:	14	222	56	3	0	185	74	21	57	632	38694150	26293	5103	1306
LEP Spanish or Spanish Creole	0	42	20	0	0	172	0	0	0	234	16305893	9310	1232	291
LEP Spanish % Tot Pop	0.0%	0.3%	0.5%	0.0%	0.0%	2.0%	0.0%	0.0%	0.0%	0.5%	5.5%	0.7%	0.4%	0.2%
French (incl. Patois, Cajun):	132	167	43	20	23	134	30	0	8	557	1282291	21848	3530	1972
LEP French (incl. Patois, Cajun)	0	9	0	2	0	50	0	0	0	61	259211	4231	592	257
LEP French % Tot Pop	0.0%	0.1%	0.0%	0.1%	0.0%	0.6%	0.0%	0.0%	0.0%	0.1%	0.1%	0.3%	0.2%	0.2%
French Creole:	0	0	0	0	0	40	0	0	0	40	786770	836	127	77
French Creole: - LEP	0	0	0	0	0	19	0	0	0	19	333271	391	51	64
LEP French Creole % of Total Pop	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.1%
Italian:	0	45	0	2	0	28	0	0	0	75	663139	1421	442	129
LEP Italian	0	0	0	0	0	12	0	0	0	12	177024	186	37	13

LEP Italian % Tot Pop	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
German:	0	102	142	18	0	49	0	9	13	333	99892 2	3910	780	450
LEP German	0	6	0	3	0	0	0	0	6	15	15788 5	334	65	26
LEP German % of Total Pop	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.1%	0.0%	0.0%	0.0%
Other Wst Germanic langs:	0	57	0	13	0	13	0	0	0	83	31115 2	564	107	88
LEP West Germanic Languages	0	7	0	0	0	0	0	0	0	7	76541	91	20	7
LEP Other W. Germ Lang. % of Total Pop	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Russian:	0	34	11	0	0	0	0	24	0	69	90087 7	1943	166	184
LEP Russian	0	5	0	0	0	0	0	0	0	5	41192 1	599	37	16
LEP Russian % of Total Pop	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
Polish:	0	6	27	3	0	22	0	0	0	58	56049 6	1199	367	69
LEP Polish	0	0	27	0	0	13	0	0	0	40	22122 2	344	144	27
LEP Polish % of Total Pop	0.0%	0.0%	0.6%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.1%	0.0%
Other Slavic languages:	0	37	0	0	0	0	0	10	0	47	32056 0	810	204	64
LEP Other Slavic Languages	0	10	0	0	0	0	0	0	0	10	12144 4	265	58	35
LEP Other Slavic Languages % of Total Pop	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other Indic languages:	0	39	0	13	0	0	0	0	0	52	89837 7	3452	301	102



LEP Other Indic Languages	0	6	0	4	0	0	0	0	0	10	360123	1440	47	10
LEP Other Indic Languages % of Total Pop	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%
Chinese:	0	339	152	3	0	35	0	0	0	529	3103996	5450	903	614
LEP Chinese	0	168	68	0	0	13	0	0	0	249	1726921	2792	497	345
LEP Chinese % of Total Pop	0.0%	1.1%	1.6%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.5%	0.6%	0.2%	0.2%	0.3%
Laotian:	0	0	0	0	0	389	20	0	0	409	148865	593	436	8
LEP Laotian	0	0	0	0	0	81	20	0	0	101	72145	207	123	0
LEP Laotian % of Total Pop	0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.5%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%
Vietnamese:	0	41	0	0	0	0	0	0	0	41	1451564	1675	362	157
LEP Vietnamese	0	22	0	0	0	0	0	0	0	22	859295	1191	224	99
LEP Vietnamese % of Total Pop	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.1%	0.1%	0.1%
Other Asian languages:	0	0	0	23	0	0	0	0	0	23	1042271	4260	623	586
LEP Other Asian Languages	0	0	0	13	0	0	0	0	0	13	325069	860	146	99
LEP Other Asian Languages % of Total Pop	0.0%	0.0%	0.0%	0.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.1%	0.1%
Other Native North American languages:	0	0	0	0	0	4	0	0	0	4	193862	93	4	0
LEP Other Native North American Languages	0	0	0	0	0	4	0	0	0	4	28578	8	4	0

LEP Other Native North American Languages % of Total Pop	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Arabic:	0	41	0	5	0	0	0	0	0	46	1035065	2820	800	216
LEP Arabic	0	5	0	0	0	0	0	0	0	5	386037	774	116	58
LEP Arabic % of Total Pop	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%
Total LEP	0	280	115	22	0	364	20	0	6	807	21822580	23023	3393	1347
All LEP % of Total Population	0.0%	1.8%	2.7%	1.3%	0.0%	4.3%	0.5%	0.0%	0.2%	1.6%	7.4%	1.8%	1.2%	1.1%

# **Appendix G**

## **Ready Rides**

### **Strategies to assist LEP Individuals**

# Ready Rides

## Strategies to assist LEP Individuals

Although there have been no requests from LEP individuals regarding issues of communication, Ready Rides will continue to work on ways to improve LEP individual communication.

Collaboration with Transit Organizations:

Ready Rides is a sub grantee working with COAST through Region 10, COAST has a well developed LEP assistance program. We will continue to work closely with them to improve our LEP services.

Translation/interpreter services:

Language Line is used in the COAST Region

Although there have been no requests from LEP individuals regarding translation of vital documents, Ready Rides will provide translation of the following documents should they be requested.

Consent of complaint forms.

All notices advising LEP individuals of free language assistance services.

Written notices of rights, responsibilities, denials, changes in benefits or services.

## **Appendix H**

### **Ready Rides Board Approval of 2019-2022 Title VI Program**

Ready Rides

Action by the Board of Directors February 20th, 2020

Board Members Present:

Margie M. Longus  
Henry M. Smith  
Carolyn M. Clarke  
Dianne M. Kelleher  
Fred Wolff  
Ray Buxton  
Richard Erickson  
Martha Lyphart  
Cathy Smith

On this date, the Ready Rides Board of Directors reviewed Ready Rides's Title VI Program and voted unanimously to approve the Program as presented.

Respectfully Submitted,

Tahja Fulwider, Coordinator

