

### Title VI/Non-Discrimination Program and Plan FY 2023-24

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#### I. INTRODUCTION

Ready Rides certifies that transit operations overseen by Ready Rides in its ten 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. <u>Requirement to Provide an Annual Title VI Certification and Assurance</u> 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. <u>Requirement to Develop Title VI Complaint Procedures and Complaint Form</u> 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 <u>Title VI/Non-Discrimination Complaint and Investigation Procedures</u> 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 Feb. 20th, 2020, and reviewed again with updated demographics on March 7th 2023. 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. <u>Requirement to Record and Report Transit Related Title VI Investigations</u>. Complaints and <u>Lawsuits</u>

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. No, we don't have a transit-specific board at this time.

Ethnic makeup of RR Board

European descent 12

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. <u>Requirement to Provide Meaningful Access to Persons with Limited English Proficiency</u> 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 <u>Identify</u> the number or proportion <u>of LEP persons eligi</u>ble 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 2021 American Community Survey 5-Year Data Compilation 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 Ten 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 2021 American Community Survey 5 year est. 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 2020 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 ACS compilation estimates the New Hampshire population at 1,377,529 and the corresponding Ready Rides service area population at 61,081. Of the total population in NH 92.3% speak only English and in the Ready Rides service area 95.2% of the population speak only English.

The largest populations speaking a language other than English at home are the Hispanic/Latino population (identified by the census as speaking the one language of Spanish estimated at 2.4% of the total state population; and other indo-European languages combined are 3.4% of the state population. In the Ready Rides service area the estimated Spanish speaking population is 0.97% of the total service area population and "Other Indo-European" languages is 0.71% of the total service area population.

Regarding ability to speak English, the ACS estimates indicate that of the non native speakers of English over the age of 5 years, individuals who speak English "Less Than Very Well", equates to 1.4% of the population of the Ready Rides service area.

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

Geography	# in Ready Rides Service Area
Total Population	61,081
Speak only English	58,137
French (incl. Patois Cajun)	222
Chinese	523
German	323
Other Indo-European languages	431
Russian, Polish, or other Slavic languages	127
Korean	104
Arabic	35
Vietnamese	32
Russian, Polish, or other Slavic languages	127
Korean	104
Arabic	35
Vietnamese	32
Other Pacific Island languages	379
Other and unspecified Languages	107

Source American Community Survey 2021 5-Year Data Compilation

<u>Determine the frequency with which LED individuals come in contact with the program</u>. There are six primary means by which an individual may come in contact with Ready Rides:

1) <u>Ready Rides printed material</u> - 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) <u>Ready Rides web site –</u> 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) <u>Telephonically</u> – Most Ready Rides transportation services are scheduled and dispatched through 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.

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 who 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) <u>Riding on Ready Rides Volunteer drivers vehicles</u> - In consultation with Ready Rides volunteer drivers, no instances have been identified in which communications with an LEP individual have 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) <u>Public meeting, hearings or community events</u> - 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 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 10 communities which are Barrington, Durham, Epping, 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 2021 data used for the analyses included in this document show only 1 LEP population approaching the 5% threshold. That is the Chinese language group in the town of Lee NH. Across all language groups the LEP population totals 1.4% of the population. The 2021 data show no language group with 1,000 or more LEP individuals in the region.

Ready Rides does not charge for the rides we provide, our service is free.

The Language Assistance Plan Implementation Matrix included as Appendix G summarizes action steps planned for FY2023-FY2024. 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 24 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 2023 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 needs as well as present operations data and funding requests for various agency functions.

<u>Consultation with Regional Health & Human Service Agencies:</u> 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.

<u>Public Outreach Meetings</u> - 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.

<u>Rider Surveys</u>-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 ten (10) towns where Ready Rides provides transportation services. Data are drawn from the 2021 American Community Survey five-year data compilation, and from the US Census 2020 and the 2021 American Community Survey 1 year 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 2021 American Community Survey 1-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 9.54%. 3 communities in the region contain minority populations exceeding the region-wide average, with minorities making up between 10.88% and 13.14% of the total population in these towns These towns include Durham (13.14%), New Market (11.03%), Lee (10.88%).

### Low Income Population

<u>T</u>able 3 identifies the number of individuals and the percentage of total population with household incomes falling below the federal poverty level according to the 2021 American Community Survey 1-year data compilation. Across the municipalities in the service area, the share of households below the federal poverty line is estimated at 8.45%. Statewide for this same ACS dataset approximately 7.2% of the population falls below the federal poverty line, while nationally an estimated 12.8% 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 (24.1%), Epping (13.3%).

### 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 statues. 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. The Title VI plan will be made available to the public on our website and as a link or file on our Facebook page.

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 by the phone or by email 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.

Written mailed 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 Info@readyrides.org

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.

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.

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	Dat	e

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 Status Action taken Status Action taken

Complaints

Complainant Date filed Summary attached

Lawsuits

Complainant Date filed Summary attached Status Action taken

Summary attached

### Appendix E

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

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

Complainant

**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: \_\_\_\_\_

\_Dat**e:**\_\_\_\_\_

### 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 2021 5-Year Data Compilation Table C16001

Geography	# in Ready Rides Service Area
Total Population	61,081
Speak only English	58,137
French (incl. Patois Cajun)	222
Chinese	523
German	323
Other Indo-European languages	431
Russian, Polish, or other Slavic languages	127
Korean	104
Arabic	35
Vietnamese	32
Russian, Polish, or other Slavic languages	127
Korean	104
Arabic	35
Vietnamese	32
Other Pacific Island languages	379
Other and unspecified Languages	107

#### Ready Rides Title VI Analysis - Minority Population

Table 2A- Estimated Minority Population by Town

Source: US Census Bureau, American Community Survey, 1 year Estimate 2021, Table S0601

Geography	Population Estimate	White	%	Black #		<sup>American</sup> Indian/ Alaska native #		Asian #	%	<sup>Hawaiian</sup> /Pac island #	%	Hispanic /Latino #	%	Some other race #	%	2 or more races #	%		Percent
Barrington	9,326	<b>7</b> 8614	91.4	# 42	1.3	<b>"</b> 13		<i>"</i> 109	0.5	<del>"</del> 0		<del>"</del> 175	1.5	48	0.1	# 500	6.7	Рор. 712	Minority 7.63
Durham	15410	13385	90.4	208	0.6	53	0.1	826	3.8	11	0.07	653	3	226	0.1	781	4.9	2025	13.14
Epping	7125	6572	95.4	28	0.4	13		82	0.8	1	0.01	131	2.9	163	0.9	372	2.6	553	7.76
Lee	4520	4028	76.5		0.1	5	-	161	12.5	2	0.04	123	5.1	33	0.7	263	10.9	492	10.88
Madbury	1918	1745	90.4	7	0.3	2	0.1	72	3	1	0.05	26	1.7	17	1	74	5.4	173	9.02
Newfields	1769	1659	95.2	1	0.06	2	0.1	38	2.1	0	0	28	1.7	7	0.4	77	4.60	110	6.22
Newmarket	9430	8716	94.1	108	1.2	0	0	211	2.3	0	0	136	1.5	2	0	236	2.5	714	7.57
Northwood	4641	3612	93.1	87	1.9	18	0.4	47	1	0	0	144	4.3	18	0.4	95	3.2	1029	22.17
Nottingham	5229	4846	95.1	20	0.3	1	0.02	47	1.1	2	0.04	132	2.5	41	0.8	272	3.5	383	7.32
Strafford	4230	3959	90%	15	0.8	8	0.2	20	5.3	3	0.07	65	1.9	26	0.6	199	5	271	6.41
Total RR Service area	63,598	57136	91.2	544	Avg below 1%	115	Avg below 1%	1613	Avg 3.2 %	20	Avg below 1%	1613	2.6%	581	Avg below 1%	2869	Avg 5%	6,462	10.16
United States	331,449, 281	204,27 7,273	61.2	41,10 4,200	12.1	3,727,1 35	1	19,886 ,049	5.8	689,96 6	0.2	62,080, 044	18.8	27,915, 715.00	7.2	33,8 48,9 43	12.6 0	127,17 2,008	38.37
New Hampshire	1,377,52 9	1,216, 218	87.9	20,12 7	1.5	3,031	0.1	35,871	2.8	453	0.03	57,424	4.3	24,102	1.4	73,8 76	6.4	161,31 1	11.71
Rockingha m County	312,771	285,71 5	93	2,278	0.9	460	0.1	6,316	2.1	92	0.03	10,257	3.3	3,787	0.8	15,5 28	3.1	27,056	8.65
Strafford County	130,889	115,89 0	87.5	1,513	1.6	310	0.23	4,506	1.3	47	0.03	3,914	3	1,367	1.4	7,25 6	8.1	14,999	11.46

		ed Service rea	Rockingh	g town, am County, ampshire	Rockingh	elds town, nam County, lampshire	Rockingh	rket town, nam County, lampshire	Rockingh	vood town, nam County, lampshire	Rocking	ham town, nam County, lampshire	Strafford	ton town, County, New npshire		wn, Strafford w Hampshire		n, Strafford w Hampshire		own, Strafford w Hampshire		
Label	Estimate	Percent of Populatio n	Estimate	Percent of Population	Estimate	Percent of Population	Estimate	Percent of Population	Estimate	Percent of Population	Estimate	Percent of Population	Estimate	Percent of Population	Estimate	Percent of Population	Estimate	Percent of Population	Estimate	Percent of Population	Estimate	Percent of Population
Total:	61,081		6,657		1,973		8,991		4,322		4,759		8,727		15,160		4,371		2,061		4,060	
Speak only English	58,137	95.18%	6,492	97.52%	1,932	97.92%	8,446	93.94%	4,207	97.34%	4,528	95.15%	8,580	98.32%	14,099	93.00%	3,901	89.25%	1,908	92.58%	4,044	6.62%
Spanish:	592	0.97%	53	0.80%	21	1.06%	183	2.04%	18	0.42%	46	0.97%	0	0.00%	209	1.38%	45	1.03%	9	0.44%	8	8 0.01%
Speak English "very well"	472	0.77%	7	0.11%	21	1.06%	143	1.59%	18	0.42%	34	0.71%	0	0.00%	191	1.26%	44	1.01%	6	0.29%	8	3 0.01%
Speak English less than "very well"	120	0.20%	46	0.69%	0	0.00%	40	0.44%	0	0.00%	12	0.25%	0	0.00%	18	0.12%	1	0.02%	3	0.15%	0	0.00%
French, Haitian, or Cajun:	222	0.36%	21	0.32%	12	0.61%	77	0.86%	9	0.21%	7	0.15%	5	0.06%	45	0.30%	44	1.01%	2	0.10%	0	0.00%
Speak English "very well"	214	0.35%	21	0.32%	9	0.46%	77	0.86%	9	0.21%	7	0.15%	0	0.00%	45	0.30%	44	1.01%	2	0.10%	0	0.00%
Speak English less than "very well"	8	0.01%	0		3	0.15%	0		0	0.00%	0	0.00%	5		0	0.00%	0	0.00%	0	0.00%	0	0.00%
German or other West Germanic			-																-			
languages:	323	0.53%	10	0.15%	3	0.15%	21	0.23%	32	0.74%	112	2.35%	0	0.00%	136	0.90%	0	0.00%	9	0.44%	0	0.00%
Speak English "very well"	284	0.46%	10	0.15%	3	0.15%	21	0.23%	32		110		0		99		0	0.00%	9	0.44%	0	
Speak English less than "very well"	39	0.06%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	2	0.04%	0	0.00%	37		0	0.00%	0	0.00%	0	0.00%
Russian, Polish, or other Slavic		0.0070	-										-			0.2	-		-			
languages:	127	0.21%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	16	0.34%	47	0.54%	64	0.42%	0	0.00%	0	0.00%	0	0.00%
Speak English "very well"	111		0	0.00%	0	0.00%	0	0.00%	0	0.00%	16	0.34%	47	0.54%	48		0	0.00%	0	0.00%	0	0.00%
Speak English less than "very well"	16		0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0		16		0		0		0	
Other Indo-European languages:	431		27		0	0.00%	58		0	0.00%	19				197	1.30%	69		61	2.96%	0	
Speak English "very well"	385		27		0	0.00%	58		0	0.00%	19		0		169		51		61	2.96%	0	
Speak English less than "very well"	46		0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0		28		18		0	0.00%	0	
Korean:	104	0.17%	0	0.00%	0	0.00%	13		0	0.00%	0	0.00%	0		28		63		0	0.00%	0	
Speak English "very well"	91	0.15%	0	0.00%	0	0.00%	13		0	0.00%	0	0.00%	0		15		63		0	0.00%	0	
Speak English less than "very well"	13		0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0		13		0		0	0.00%	0	
Chinese (incl. Mandarin,	10	010270		0.0070		0.0070		0.0070		0.0070		0.0070		0.0070	10	0.0570		0.0070	-	0.0070		0.0070
Cantonese):	523	0.86%	0	0.00%	2	0.10%	5	0.06%	25	0.58%	17	0.36%	0	0.00%	201	1.33%	249	5.70%	23	1.12%	1	0.00%
Speak English "very well"	173		0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	95		69		8	0.39%	1	
Speak English less than "very well"	350		0	0.00%	2	0.10%	5	0.06%	25	0.58%	17	0.36%	0	0.00%	106	0.70%	180	4.12%	15	0.73%	0	0.00%
Vietnamese:	32		0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0		32		0		0	0.00%	0	
Speak English "very well"	32		0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	-		32		0		0	0.00%	0	
Speak English less than "very well"	0		0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%			0	0.00%	0		0	0.00%	0	
Tagalog (incl. Filipino):	69		54		0	0.00%	0		0	0.00%	14			010070	0	0.00%	0	0.0070	1	0.05%	0	
Speak English "very well"	69		54		0	0.00%	0		0	0.00%	14			0.0070	0	0.00%	0		1	0.05%	0	
Speak English less than "very well"	0		0		0		0		0		0	0.00%			0		0		0		0	
Other Asian and Pacific Island		010070		0.0070		0.0070	0	0.0070		0.0070		0.0070		010070		0.0070		0.0070		0.0070		0.0070
languages:	379	0.62%	0	0.00%	0	0.00%	178	1.98%	24	0.56%	0	0.00%	34	0.39%	115	0.76%	0	0.00%	21	1.02%	7	0.01%
Speak English "very well"	282		0		0		95		24		0	0.00%	34		108		0		21		0	
Speak English less than "very well"	97		0		0	010070	83		0	0.00%	0	0.00%	0		7	0.05%	0		0		7	
Arabic:	35		0	010070	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0		8	0.05%	0		27		,	
Speak English "very well"	32		0	0.00%	0	0.00%	0		0	0.00%	0	0.00%	0		8	0.05%	0		24		0	
Speak English less than "very well"	32	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0		0	0.00%	0		3	0.15%	0	
Other and unspecified languages:	107		0	0.00%	3	0.15%	10		7	0.0070	0	0.00%	61		26		0	0.0070	0	0.00%	0	
Speak English "very well"	107		0	0.00%	3	0.15%	10		7		0	0.00%	61		26		0	0.0070	0	0.00%	0	
	107		0		3	0.15%	10	0.11%	/		0	0.00%	0		26	0.17%	0	0.0070	0	0.00%	0	
Speak English less than "very well"	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0		0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

#### Ready Rides Title VI Analysis - Population in Poverty Table 3 - Ratio of Income to Poverty Level by Municipality

Geography	Total Populati on	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	9,326	231	500	568	588	908	1,056	5.4%
Durham	15,490	561	877	952	1,011	1,087	1,094	24.1%
Epping	7,125	1,209	466	1,887	2,018	2,214	2,240	24.1%
Lee	4,520	62	110	165	755	893	912	2.4%
Madbury	1,918	30	65	72	80	146	181	3%
Newfields	1,769	3	7	19	80	80	85	0.8%
Newmarket	9,430	268	363	756	947	1,288	1,390	5.5%
Northwood	4,641	63	304	319	399	520	574	6.6%
Nottingham	5,229	41	239	427	511	585	623	5.1%
Strafford	4,230	229	318	320	518	714	749	7.5%
Ready Rides Service Area	63,678	2,697	3,249	5,485	6,907	8,435	8,904	average 8.45%
United States	324,173, 084	20,039,5 37	41,393,1 76	53,659,5 59	66,893,3 57	847,786, 034	92,740,9 02	12.8%
New Hampshire	1,377,52 9	49,839	97,403	121,381	160,518	213,517	235,520	7.2%
Rockingham County	312,771	6,834	13,241	18,680	25,229	31,940	35,390	4.2%
Strafford County	130,889	6,070	10,742	13,904	16,437	21,654	23,365	8.7%

Source: U.S. Census Bureau Survey/Program: American Community Survey Year: 2021 Estimates: 1-Year Table ID: S1701 Table 4-LEP Population by Town and Language Group includes a comprehensive data table from the 2021 American Community Survey 1 year est. regarding populations with Limited English Proficiency (LEP).

Geography	English only	Spanish	Other Indo-Europ ean Ianguages	Asian and Pacific Islander Ianguages	Other languages	Speaks English Very Well	Speaks English Iess than Very Well
Barrington	98.3%	0%	0.6%	0.4%	0.7%	99.9%	0.1%
Durham	91.7%	1.7%	3.5%	2.9%	0.3%	98.4%	1.6%
Epping	88.0%	4.1%	3.7%	3%	1.2%	97%	3%
Lee	89.2%	1%	2.6%	7.1%	0.0%	95.4%	4.5%
Madbury	92.6%	0.4%	3.5%	2.2%	1.3%	99%	1%
Newfields	97.8%	0%	1.10%	0%	1.1%	100%	0%
Newmarket	92%	2%	2%	3.7%	0.2%	98.2%	1.8%
Northwood	97.3%	0.4%	0.9%	1.1%	0.2%	99.4%	0.6%
Nottingham	95.1%	1%	3.20%	0.7%	0%	99.3%	0.7%
Strafford	99.6%	0.2%	0%	0.2%	0%	99.8%	0.2%
Averages in Ready Rides service area	94.2%	1.1%	2.1%	2.1%	0.5%	98.6%	1.4%
New Hampshire	92.3%	2.4%	3.4%	1.3%	0.5%	5.6%	2.1%
United States	78.4%	13.2%	3.8%	3.5%	1.2%	91.7%	8.3%
Rockingham County	93.5%	2.1%	2.7%	1.1%	0.5%	99.0%	1.0%
Strafford County	94.5%	1%	2.1%	2.0%	0.4%	2.9%	1.2%

Source: U.S. Census Bureau

LANGUAGE SPOKEN AT HOME

Survey/Program: American Community Survey Year: 2021 Estimates: 1-Year Table ID: S1601 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 2023-2024 Title VI Program

Ready RidesAction by the Board of Directors July 7th, 2023Board Members Voting to Approve:

Henry Smith			
Sandra Jones			
Betty Smith			
Margie Longus			
Dianne Kelleher			
Martha English			
Carolyn Clark			

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

Respectfully Submitted,

Tahja Fulwider, Coordinator