

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

The CareGivers

June 22, 2023

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

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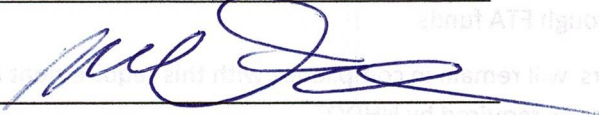
The CareGivers Title VI plan includes the following elements:

1. Plan Approval, Annual Certifications and Assurances, Revision Log
2. Policy Statement
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Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan
Adopted on: June 22, 2023

Adopted by: Catholic Charities New Hampshire

Signature(s): 

Approval:

Title VI Plan Revision Log

Date	Section Revised	Summary of Revision
06/22/2023	Plan renewal and approval	

Annual Certifications and Assurances

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

The CareGivers will remain in compliance with this requirement by annual submission of certifications and assurances as required by NHDOT.

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

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions
06/22/2023	Plan renewal and approval	

Section 2: Title VI Policy Statement

Policy Statement

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

Section 3: Notice to the Public

Title VI Notice to the Public

The CareGivers' Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

The CareGivers

- The CareGivers operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with The CareGivers.
- For more information on The CareGivers' civil rights program, the procedures to file a complaint, or to file a complaint, please contact James Wilkie, Executive Director at 603-622-4948; email james@caregiversnh.org; or visit our administrative office at 700 E. Industrial Park Dr., Manchester, NH 03110. For more information, visit www.caregiversnh.org

- For transportation-related Title VI matters, a complaint may also be filed directly with the:

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

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

- If information is needed in another language, contact **855-774-5841**.

The CareGivers Notice to the Public is posted in the public areas of the office and on the CareGivers website.

1. Reception Area – The CareGivers
2. www.caregiversnh.org

Section 4: Title VI Complaint Procedure

The CareGivers' Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: www.caregiversnh.org
 - Hard copy in the central office
 - Agency Title VI Plan
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Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by The CareGivers may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

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

A complaint must be filed with The CareGivers no later than 180 days after the following:

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

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

The CareGivers has 45 days to investigate the complaint. If more information is needed to resolve the case, The CareGivers may contact the complainant requesting further information. The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, The CareGivers can administratively close the case.

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

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has 15 days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

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

Or

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

If information is needed in another language, then contact **(855) 774-5841**.

Section 5: Title VI Complaint Form

The CareGivers' Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: www.caregiversnh.org
- Hard copy in the central office
- Agency Title VI Plan

The CareGivers Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				

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

Title VI: Race Color National Origin

Other (specify): _____

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

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

Section IV

Have you previously filed a Civil Rights related complaint with this agency?	Yes	No
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Section V

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

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court _____ State Agency _____

State Court _____ Local Agency _____

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

Name:

Title:

Agency:

Address:

Telephone:

Section VI

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

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

Signature and date required below

Signature

Date

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

**The CareGivers
James Wilkie / Executive Director
700 E. Industrial Park Dr.
Manchester, NH 03109
603-622-4948
james@caregiversnh.org**

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

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

Check One:

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

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

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

Section 7: Public Participation Plan

Strategies and Desired Outcomes

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

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The public outreach and involvement activities conducted by **The CareGivers** since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	The CareGivers Staffer(s) or Department	Activity	Communication
			Method (Public notice, posters, social media)
Reoccurring Monthly	James Wilkie	RCC 7 Meeting	
Reoccurring Monthly	James Wilkie	RCC 8 Meeting	
6/1/2021	Catholic Charities Marketing	Murray Outdoor Communications	Billboards
2/23/2022	Catholic Charities Marketing	Murray Outdoor Communications	Billboards
11/8/2022	James Wilkie	Nashua Welfare office	Brochures
11/8/2022	James Wilkie	Nashua Senior Center	Brochures
6/24/2022	James Wilkie / Michele Hart	Town of Merrimack Welfare office	Introduction meeting / brochures
6/9/2022	James Wilkie / Michele Hart	SCC Conference	Networking
2/22/2023	James Wilkie / Ryan Noronha	Wolfeboro Meals on Wheels	Networking
10/26/2022	James Wilkie / Michele Hart	Merrimack Senior Information Fair	Networking / Brochures
2/8/2023	James Wilkie	Nashua Transit Authority	Networking / Brochures
4/30/2021	Catholic Charities Marketing	Union Leader	Newspaper
5/19/2021	Catholic Charities Marketing	Outfront Media	Print
3/9/2022	Catholic Charities Marketing	Outfront Media	Print

3/16/2023	Catholic Charities Marketing	LPI	Print
2/27/2023	James Wilkie / Michele Hart	United Way Community Connections Radio Show	Radio interview
10/17/2022	Catholic Charities Marketing	WZID	Radio spots
10/27/2020	Catholic Charities Marketing	facebook	Social Media
11/27/2020	Catholic Charities Marketing	facebook	Social Media
2/26/2021	Catholic Charities Marketing	facebook	Social Media
2/27/2021	Catholic Charities Marketing	facebook	Social Media
3/27/2021	Catholic Charities Marketing	facebook	Social Media
5/12/2021	Catholic Charities Marketing	facebook	Social Media
5/23/2021	Catholic Charities Marketing	facebook	Social Media
5/27/2021	Catholic Charities Marketing	facebook	Social Media
6/5/2021	Catholic Charities Marketing	facebook	Social Media
6/16/2021	Catholic Charities Marketing	facebook	Social Media
6/26/2021	Catholic Charities Marketing	facebook	Social Media
6/27/2021	Catholic Charities Marketing	facebook	Social Media
7/27/2021	Catholic Charities Marketing	facebook	Social Media
8/27/2021	Catholic Charities Marketing	facebook	Social Media
9/27/2021	Catholic Charities Marketing	facebook	Social Media
10/27/2021	Catholic Charities Marketing	facebook	Social Media
11/27/2021	Catholic Charities Marketing	facebook	Social Media
2/21/2022	Catholic Charities Marketing	facebook	Social Media
2/27/2022	Catholic Charities Marketing	facebook	Social Media
3/18/2022	Catholic Charities Marketing	facebook	Social Media
3/27/2022	Catholic Charities Marketing	facebook	Social Media
4/10/2022	Catholic Charities Marketing	facebook	Social Media
4/26/2022	Catholic Charities Marketing	facebook	Social Media
4/27/2022	Catholic Charities Marketing	facebook	Social Media
5/12/2022	Catholic Charities Marketing	facebook	Social Media
5/27/2022	Catholic Charities Marketing	facebook	Social Media

6/11/2022	Catholic Charities Marketing	facebook	Social Media
6/27/2022	Catholic Charities Marketing	facebook	Social Media
7/18/2022	Catholic Charities Marketing	facebook	Social Media
9/20/2022	Catholic Charities Marketing	Meta (facebook)	Social Media
9/24/2022	Catholic Charities Marketing	facebook	Social Media
9/27/2022	Catholic Charities Marketing	facebook	Social Media
9/30/2022	Catholic Charities Marketing	facebook	Social Media
10/4/2022	Catholic Charities Marketing	facebook	Social Media
10/27/2022	Catholic Charities Marketing	facebook	Social Media
3/27/2023	Catholic Charities Marketing	Meta (facebook)	Social Media
3/27/2023	Catholic Charities Marketing	Meta (facebook)	Social Media
10/4/2022	Catholic Charities Marketing	Meta (facebook)	Social Media
5/30/2021	Catholic Charities Marketing	effectv (Comcast)	TV Spots
6/27/2021	Catholic Charities Marketing	effectv (Comcast)	TV Spots
6/27/2021	Catholic Charities Marketing	WMUR	TV Spots
4/25/2022	Catholic Charities Marketing	Effectv	TV Spots
5/29/2022	Catholic Charities Marketing	WMUR	TV Spots
6/12/2022	Catholic Charities Marketing	WMUR	TV Spots
11/30/2022	Catholic Charities Marketing	WMUR	TV Spots
3/26/2023	Catholic Charities Marketing	WMUR	TV Spots
3/28/2023	Catholic Charities Marketing	Effectv	TV Spots
5/9/2023	Ryan Noronha	Wolfeboro - Various locations	Brochures
5/22/2023	James Wilkie	Alton - Various locations	Brochures

Section 8: Language Assistance Plan

Plan Components

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

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The CareGivers' Language Assistance Plan includes the following elements:

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

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

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

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

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

Four Factor Analysis Methodology

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

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

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

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

- (a) Use of volunteer transportation services;
- (b) Customer service interactions;

- (c) Ridership surveys;
- (d) Operator surveys.

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

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

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

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

Of the 365,861 residents in **The CareGivers** service area, 19,710 residents describe themselves as speaking English less than “very well”. For The CareGivers service area, the latest U.S. Census Bureau data shows that among the area’s population 0.053% speak English “less than very well.” **For these groups** who speak English “less than very well” 0.04% speak Tagalog (incl. Filipino), 0.06% speak Korean, 0.07% speak German or other West Germanic languages, 0.17% speak Other and unspecified languages, 0.20% speak Arabic, 0.25% speak Chinese (incl. Mandarin, Cantonese), 0.28% speak Other Asian and Pacific Island languages, 0.28% speak Russian, Polish, or other Slavic languages, 0.28% speak Vietnamese, 0.61% speak French, Haitian, or Cajun, 0.89% speak Other Indo-European languages, and 2.26% speak Spanish.

For the combined service area of Alton, Wolfeboro, Amherst, Bedford, Brookline, Goffstown, Hollis, Hudson, Litchfield, Manchester, Merrimack, Milford, Nashua, Hooksett, Auburn and Candia: (for town by town specific data, see appendix A)

	Combined Service Area	
Label	Estimate	Percent of Population
Total:	365,861	
Speak only English	310,930	84.99%
Spanish:	19,512	5.33%
Speak English "very well"	11,261	3.08%
Speak English less than "very well"	8,251	2.26%
French, Haitian, or Cajun:	8,135	2.22%
Speak English "very well"	5,888	1.61%
Speak English less than "very well"	2,247	0.61%
German or other West Germanic languages:	1,200	0.33%
Speak English "very well"	956	0.26%

Speak English less than "very well"	244	0.07%
Russian, Polish, or other Slavic languages:	2,668	0.73%
Speak English "very well"	1,645	0.45%
Speak English less than "very well"	1,023	0.28%
Other Indo-European languages:	11,268	3.08%
Speak English "very well"	8,008	2.19%
Speak English less than "very well"	3,260	0.89%
Korean:	350	0.10%
Speak English "very well"	118	0.03%
Speak English less than "very well"	232	0.06%
Chinese (incl. Mandarin, Cantonese):	1,883	0.51%
Speak English "very well"	965	0.26%
Speak English less than "very well"	918	0.25%
Vietnamese:	1,553	0.42%
Speak English "very well"	528	0.14%
Speak English less than "very well"	1,025	0.28%
Tagalog (incl. Filipino):	591	0.16%
Speak English "very well"	434	0.12%
Speak English less than "very well"	157	0.04%
Other Asian and Pacific Island languages:	3,919	1.07%
Speak English "very well"	2,911	0.80%
Speak English less than "very well"	1,008	0.28%
Arabic:	1,729	0.47%
Speak English "very well"	999	0.27%
Speak English less than "very well"	730	0.20%
Other and unspecified languages:	2,123	0.58%
Speak English "very well"	1,508	0.41%
Speak English less than "very well"	615	0.17%

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

The CareGivers assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. The CareGivers provides approximately 4500 passenger trips per year. If an individual has speech limitations, the CareGivers Ride Scheduler or driver will work with the New Hampshire Department of Transportation, if needed, to ensure the individual receives access to the transit services.

The Caregivers conducted a LEP study in conjunction with a survey of staff and clients to ensure full understanding of LEP interactions or requested translation services. The results of the survey concluded no significant requests are made at this time. To meet the Safe Harbor requirements, The Caregivers will translate vital documents to Spanish and continue to evaluate all other language categories at this time. If a request is made for a language meeting the Safe Harbor Threshold, The Caregivers will provide translations services.

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

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

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

The CareGivers makes every effort to make its programs, services, and activities, accessible to LEP individuals. **The CareGivers** uses many mediums including distribution of brochures to Dialysis Centers, Dr. Offices, senior centers, welfare offices, and senior housing complexes. Additional outreach is made through referrals, radio, print ads, social media, and TV spots.

While there may be minor variation in the outreach process from time-to-time, the outline below provides the general steps for engaging riders in the decision-making process using a fare or service change as an example.

1. Outreach In advance of service changes or notice of public information sessions if required (using tool-box of mediums listed below);
 1. Letters to clients
 2. Clients are notified via phone call when client mail is returned as undeliverable.
 3. Client are notified via phone whenever they call to schedule services
 4. Potential changes are posted to the program website.
 5. Certified Languages International will be utilized when language barriers exist.
 6. Decisions regarding day to day operations are reviewed by the Executive Director of The CareGivers
 7. Decisions outside of day to day operations, including expansion of services are reviewed by the Chief Operations Officers of Catholic Charities NH and escalated to the CEO and Board of Trustees as appropriate

The CareGivers will use available resources, both internal and external to accommodate reasonable requests for translations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language
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The CareGivers has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Executive Director as need.

- b) The CareGivers has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.

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

In order to ensure that LEP individuals are aware of The CareGivers' language assistance measures, The CareGivers provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Ride Schedulers are provided "I Speak" language cards to identify language needs in order to match them with available services.
- Annual survey of staff and clients will be conducted to ensure discussion of any language needs are being identified and met by The Caregivers and will be included in the Title VI Plan's LEP Study.

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

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

Updates will continue to include the following:

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

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

The following training will continue to be provided to The CareGivers staff:

- Information on The CareGivers Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

The CareGivers shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Certified Languages International to obtain translators. The agency will also utilize web-based translator programs, i.e. Google Translate, when needed.

If you need help with English, please call 855-774-5841.

The CareGivers distributed a language survey to its employees. The objective of the survey was to evaluate the needs of The CareGivers customers who are not able to communicate in English. The first question asked, In What Way(s) Do You Interact with The CareGivers riders? The chart below illustrates the results.

Method of Interaction	Percent of Responses
Telephone	<u>100</u>
Face to Face	<u>0</u>
Email	<u>100</u>
Fax	<u>0</u>

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

Frequency of Interaction	Percent of Responses
Often	
Sometimes	
Rarely	
Never	100

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

Language	Percent of Interactions
English	100

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

Effectiveness	Percent of Total Responses
Very Effective	N/A
Moderately Effective	
Less Effective	
Unable to Communicate	

Survey of Agency Practices

The CareGives also reviewed its processes and historical data to assess the extent to which they came into contact with LEP populations. Community partners were asked the following questions:

1. Do you encounter non-English speaking/reading people who need your services?
2. If so, what are the top three languages that you encounter?
3. How do you address language barriers?
4. Do you find language to be a barrier in preventing you from providing service?

Information on the review of The CareGivers

<u>Question</u>	<u>The CareGivers</u>
Do you encounter non-English speaking/reading	<u>No</u>

people who need your services?	
If so, what are the top three languages that you encounter?	<u>N/A</u>
How do you address language barriers?	<u>Interpreter services are available</u>
Do you find language to be a barrier in preventing you from providing service?	<u>No</u>

Consulting Directly with the LEP Population

In addition to the U.S. Census, American Community Survey data, employee survey, and outreach to community partners, The Caregivers conduct an annual survey of its riders. Each client is contacted via phone call and given the opportunity to answer questions and provide feedback on services. All calls are interactive. Future surveys will include language specific questions to identify needs of its clients. The most recent rider survey was completed on April 20, 2023 with the following results

TOTAL CLIENTS WHO COMPLETED SURVEY		153
Count of ALLEVIATED SOME STRESS OR WORRY - YES	136	89%
Count of ALLEVIATED SOME STRESS OR WORRY - NO	17	11%
Count of IMPROVED MY QUALITY OF LIFE - YES	133	98%
Count of IMPROVED MY QUALITY OF LIFE - NO	20	13%
Count of STRETCHED MY BUDGET TO AFFORD MEDICINE, UTILITY BILLS - YES	140	92%
Count of STRETCHED MY BUDGET TO AFFORD MEDICINE, UTILITY BILLS - NO	13	8%
Count of ALLOWED ME TO CONTINUE TO LIVE AT HOME - YES	141	92%
Count of ALLOWED ME TO CONTINUE TO LIVE AT HOME - NO	12	8%
Count of HAVE YOU TOLD A FRIEND ABOUT THIS PROGRAM - YES	126	82%
Count of HAVE YOU TOLD A FRIEND ABOUT THIS PROGRAM - NO	27	18%
Count of SATISFIED WITH THE PROCESS OF SCHEDULING RIDES - YES	139	91%
Count of SATISFIED WITH THE PROCESS OF SCHEDULING RIDES - NO	14	9%
Count of SATISFIED WITH THE NUMBER OF RIDES AVAILABLE PER WEEK - YES	136	89%
Count of SATISFIED WITH THE NUMBER OF RIDES AVAILABLE PER WEEK - NO	17	11%

"I Speak" Language Identification Card

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

I Speak...

Language Identification Guide

A

Amharic
አኔ አማርኛ ነው ምናገረው.

Arabic
أنا أتحدث اللغة العربية

Armenian
Ես խոսում եմ հայերեն

B

Bengali
আমি বাংলা কথা বলতে পারি

Bosnian
Ja govorim bosanski

Bulgarian
Аз говоря български

Burmese
ကျွန်ုပ်တို့/ကျွမ်း မြန်မာစကားပြောနိုင်ပါသည်

C

Cambodian
ខ្ញុំនិយាយភាសាខ្មែរ

Canonese
我講廣東話 (Traditional)
我讲广东话 (Simplified)

Caolan
Faois caolan

Croatian
Govorim hrvatski

Czech
Mluvím česky

D

Danish
Jeg taler dansk

Dari
من دری حرف می زنم

Dutch
Ik spreek het Nederlands

E

Esonian
Ma rãgîn ceei keeh

F

Finnish
Puhun suomea

French
Je parle français

G

German
Ich spreche Deutsch

Greek
Μιλώ το ελληνικό

Gilsonat
ལྷ འུམ་རྒྱལ་གྱི་ འོལུ་ལུ

H

Haitian Creole
M pale kretyòl ayisyen

Hebrew
אני מדבר עברית

Hindi
मैं हिंदी बोलता हूँ।

Hmong
Kuv has lug Moob

Hungarian
Beszélök magyarul

I

Icelandic
Ég tala íslensku

Ilocano
Aposnak ti Ilokano

Indonesian
saya bisa berbahasa Indonesia

Italian
Parlo italiano

J

Japanese
私は日本語を話す

K

Kachchiquel
Quin chagüin'ki chibal'ruin'ni

Korean
한국어 합니다

Kurdish
man Kurdi zanim

Kurmanji
man Kurmanjî zanim

L

Laoian
ຂ້ອຍປາກົວພາສາລາວ

Latvian
Es runāju latviski

Lithuanian
Aš kalbu lietuviškai

Q

Qanjobal
Ayin ti ohl'w'al q' anjob' al

Quiche
En k'iche' xox' k'u'in oh'c' quiché

R

Romanian
Vorbesc românește

Russian
Я говорю по-русски

S

Serbian
Ja govorim srpski

Siga Language


Slovak
Hovorim po slovensky

Slovenian
Govorim slovensko

Somali
Waxaan ku hadlaa af-Soomaalí

Spanish
Yo hablo español

Swahili
Ninasonga Kiswahili

Swedish
Jag talar svenska

T

Tagalog
Marunong akong mag-Tagalog

Tamil
நான் தமிழ் பேசுவேன்

Thai
พูดภาษาไทย

Turkish
Türkçe konuşurum

U

Ukrainian
Я розмовляю українською мовою

Urdu
میں اردو بولتا ہوں

V

Vietnamese
Tôi nói tiếng Việt

W

Welsh
Dwi'n siarad

X

Xhosa
Ndiithotha isiXhosa

Y

Yiddish
איך רעד יידיש

Yoruba
Mo nso Yoruba

Z

Zulu
Ngiyasikhuluma isiZulu

Executive Order 13166 requires DHS to take reasonable steps to provide meaningful access to its programs and activities for persons with limited English proficiency and - as also required by Title VI of the Civil Rights Act of 1964 - to ensure that recipients of federal financial assistance do the same.

I Speak is provided by the Department of Homeland Security Office for Civil Rights and Civil Liberties' (CRCL). Other resources at www.lep.gov

Contact the DHS Office for Civil Rights and Civil Liberties' CRCL Institute at CRCLTraining@dhs.gov for digital copies of this poster or a "I Speak" booklet.

Download copies of the DHS LEP plan and guidance to recipients of financial assistance at www.dhs.gov/crcl



Homeland Security

Log of LEP Encounters

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

Section 9: Minority Representation Information

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

A. Minority Representation Table

Non-Elected Committees and Councils

At **THE CAREGIVERS**, decisions regarding policy, service changes, fares, capital programming and facility locations are made by Catholic Charities New Hampshire, the owner of the program. At his time, we have no specific transit committees.

Body	Caucasian	African American	Hispanic	Asian	Race 4	Race 5
Board of Directors	N/A					
Service Review Committee	N/A					

B. Efforts to Encourage Minority Participation

To encourage participation on its boards, committees, and councils, The CareGivers will make every effort to encourage minority participation on the boards.

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other agency names here)

The CareGivers monitors subrecipients using the following process:

1. The CareGivers uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: (document the process here)
2. The CareGivers collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

Section 11: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

Section 12: Fixed Route Transit Providers Service Standards and Policies

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

The CareGivers:

is a fixed route transit provider

is **not** a fixed route transit provider

All Fixed Route Transit Providers must submit:

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